

Siegel, Yee,
Brunner
& Mehta

March 14, 2024

ATTORNEYS AT LAW

❖ DAN SIEGEL
❖ ALAN S. YEE
❖ JANE BRUNNER
❖ SONYA Z. MEHTA
❖ EMILY ROSE JOHNS
❖ SARA BELADI

OF COUNSEL

❖ ANNE
BUTTERFIELD
WEILLS

Hon. William H. Orrick
United States District Court
450 Golden Gate Avenue
San Francisco, CA 94102

Re: *Junior v. Superior Court*, 3:22-cv-07270.

Dear Judge Orrick:

Plaintiff Arlene Junior respectfully requests that the Court compel defendants Superior Court of the County of Sonoma and Shelly Averill to comply with plaintiff's discovery requests, in accordance with FRCP Rules 26 and 37. We have met and conferred with defendants and reminded them of their obligations under the Federal Rules of Court over the past several months in a protracted good-faith effort resolve the parties' discovery disputes without judicial intervention. Defendants' repeated delays, refusal to produce the requested documents, and refusal to adequately support their assertions of privilege have left us at a gross disadvantage in litigating our client's claims on the merits.

On June 27, 2023, plaintiff alerted defense counsel to the fact that defendant's initial disclosure statement, governed by General Order 71, stated that sixteen items were disclosed, but that they were not in fact included in defendants' initial production. On October 13, 2023, plaintiff sent defendants a meet-and-confer letter regarding the deficiencies in their initial disclosures and their responses to Plaintiff's Request for Production of Documents, Set One, propounded on May 8, 2023. Defendants' Response to Plaintiff's Request for Production of Documents, Set One, is attached as Exhibit A. That letter highlighted documents that defendant had failed to produce and the inadequacy of their numerous boilerplate objections to plaintiff's requests. Plaintiff's lead counsel, Dan Siegel, met by video with defendants' lead counsel, Corrie Klekowski, on October 17, 2023. On December 8, 2023, we emailed to defendants a draft discovery letter, outlining the outstanding deficiencies in defendants' discovery responses and asked for defendants' contributions. On December 11, 2023, defendants advised us that they intended to produce additional documents and a substantive response to plaintiff's October meet and confer letter. On December 15, defendants provided plaintiffs with a letter response and 161 pages of documents. However, that production did not include many of the outstanding documents. Plaintiffs responded to defendant's letter in a December 28, 2023 letter, and asked defendants to produce outstanding documents by January 8, 2024 to avoid the necessity of seeking judicial intervention. Defendants responded to that letter on January 11, 2024, in which they represented that they would produce additional

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documents and privilege logs. Defendants never produced the privilege logs they promised. Defendant Sonoma County Superior Court produced a supplemental response to Requests for Production, Set Two on January 29, 2024, which contained additional unsupported objections. Defendant's Supplemental Response is attached as Exhibit B. On February 26 and 27, 2024, plaintiff emailed defendants to inquire about the date on which they can expect defendants to produce documents responsive to Request for Production, Set Two and Request for Production No. 21. Defendant's Response to Plaintiff's Request for Production, Set Two is attached as Exhibit C. Defendants responded as to RFP No. 21 only. On March 7, 2024, Defendants produced documents responsive to Request 21, which asks for "the entire contents of the large file that was left on plaintiff's desk on the day she was terminated, including, but not limited to, notes, documents, accountings and responses related to Margaret Smith's complaints about plaintiff and the investigations of those complaints." Plaintiff was not allowed to collect this or any property in her office when she was escorted out of her office upon notice of termination. Missing among their production responsive to this request are plaintiff's files on the workplace investigations of complaints about her and from her and documentation of a "listening tour" she conducted during her employment. Plaintiff emailed defendants a meet and confer letter on March 13, 2024, which they discussed in-depth via telephone.

Documents responsive to the following requests for production have not been produced: Nos. 20, 67–88.

Production in response to the following requests are clearly incomplete: 3, 17, 21, 28, 40, 43, 57, 66, 77, 82, 87.

We ask the Court to assist in resolving these disputes.

Very truly yours,

Sara Beladi

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Defendants' Response:

Plaintiff brings claims against Defendants Sonoma County Superior Court and Judge Shelly Averill for discrimination- and retaliation-based claims associated with her termination from the Sonoma County Superior Court in May of 2022. Plaintiff was terminated after the conclusion of four independent investigations, three of which found she engaged in misconduct, including retaliating against a subordinate for filing a complaint and misrepresenting facts to the Presiding Judge. The fourth found that the two investigations into Plaintiff's retaliatory conduct were not motivated by Plaintiff's race. Plaintiff now seeks information which is entirely irrelevant to her claims, her termination, or to the investigations.

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1. The Requests are Plainly Overbroad.

Among other things, Plaintiff now seeks "all email communications" from January 1, 2021 through December 31, 2021, between Plaintiff and various witnesses. These witnesses include Judge Bradford DeMeo (RFP No. 66), Court Services Supervisor Leti Valencia (RFP No. 77), Judicial Services Manager Julie Wilcox (RFP No. 80), and even the Superior Court's outside attorney, Doug Friefeld (RFP No. 88). RFP No. 82, which seeks all email communications between Plaintiff and Director of Information Hema Krishnamurthy, is not limited to 2021; rather, Plaintiff seeks all emails between Plaintiff and the Director of Information—an employee who did participate in the decision to terminate Plaintiff—throughout Plaintiff's entire employment.

These requests are plainly overbroad and seek a wide breadth of irrelevant, private, and privileged information. In particular, RFP No. 88, which seeks all communications between Plaintiff and the court's attorney, explicitly seeks attorney-client privileged information. This request is improper; Plaintiff's communications with the Court's attorney during her employment are not discoverable and should not be produced. *See Upjohn Co. v. U.S.*, 449 U.S. 383, 394 (1981).

Additionally, Plaintiff has not provided any reason for needing "all email communications" with the referenced witnesses, including information irrelevant to whether Plaintiff was terminated based on the results of independent investigations. What's more, Plaintiff rejected Defendant's reasonable and good-faith narrowing of these requests to responsive emails "which discuss Plaintiff's job performance, any complaints against Plaintiff, and the independent investigations related to Plaintiff." Plaintiff has not identified any other categories of emails between Plaintiff and the witnesses

which could have any bearing on this case. Plaintiff has also not agreed to narrow the request or otherwise provide a written explanation of the requested emails' relevancy, despite Defendant's invitation to do so.

2. The Requests Implicate Privacy Rights, With No Explanation of Why These Rights Are Outweighed By Plaintiff's Interest.

The remainder of Plaintiff's requests are similarly overbroad, seeking irrelevant information that is, at times, clearly protected by the individual's right to privacy. Whether an individual's private information may be disclosed in the discovery process is a "balancing test" which requires weighing factors such as "the purpose of the information sought, the effect that disclosure will have on the parties and on the trial, the nature of the objections urged by the party resisting disclosure, and the ability of the court to make an alternative order which may grant partial disclosure..." *Dale Evans Parkway 2012, LLC v. Nat'l Fire & Marine Ins. Co.*, 2016 U.S. Dist. LEXIS 187094, 2016 WL 7486606, at *5 (C.D. Cal. Oct. 27, 2016) (quoting *Fortunato v. Superior Court*, 114 Cal.App.4th 475, 480-81 (Cal. Ct. App. 2003)).

Here, Plaintiff seeks information regarding the demotions, promotions, and disciplinary documents of witnesses who were not involved in the decision to terminate Plaintiff's employment. For example, Plaintiff seeks:

Request No. 67: Please produce all documentation from Jennifer Campbell's Sonoma County Superior Court personnel file regarding her demotion by plaintiff, from Court Supervisor to Courtroom Clerk, including, but not limited to, the status form reflecting the change in status and the memorandum written by plaintiff.

Request No. 68: Please produce all email communications between plaintiff and Jennifer Campbell regarding her demotion from Court Supervisor to Courtroom Clerk.

Request No. 69: Please produce all email communications between plaintiff and Jennifer Campbell regarding her promotion, by plaintiff, from Courtroom Clerk to Court Supervisor.

Plaintiff does not allege she was retaliated against or otherwise discriminated against for effecting these demotions or promotions. Defendant does not contend this demotion or promotion was improper or otherwise relevant to the case. Plaintiff has failed to provide any reasoning as to why the above documentation outweighs Jennifer Campbell's right to privacy.

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Similarly, in RFP No. 81, Plaintiff claims she is entitled to “all disciplinary documents in Julie Wilcox’s personnel file, issued by former Chief Executive Officer Jose Guillen, including but not limited to those issued for dishonesty and eavesdropping.” Julie Wilcox’s right to privacy is obviously implicated in this request, and what’s more, the request makes clear it seeks documents from before Plaintiff was employed with the Court. Plaintiff has not proposed a narrowed request, or written reasoning as to why Julie Wilcox’s privacy interests are outweighed, as requested by Defendant.

RFP No. 72 also seeks “all email communications between plaintiff and Linda Walker regarding Brett O’Rourke’s job description, job duties and responsibilities, job performance and/or any complaints regarding his job performance.” RFP No. 71 seeks “Linda Walker’s notes regarding requests from plaintiff regarding Brett O’Rourke’s job description, duties, and responsibilities.” Again, Defendant does not contend Plaintiff improperly disciplined Brett O’Rourke, and Plaintiff has not provided any reasoning as to why this information is relevant or outweighs his right to privacy.

3. The Requests Are Plainly Intended to Harass.

Besides being overbroad and implicating privacy interests, the requests additionally touch on irrelevant subjects apparently for the sole purpose of harassment. For example, RFP Nos. 74-76 seek information regarding “the rodent and rat infestation at the Empire College Annex, Civil Departments 16 and 17,” and RFP Nos. 78-79 seeks information regarding “the handling of the complaint that the District Attorney filed against PG&E on or around April 7, 2021.” At no point in this litigation—after over 8,000 pages of document production and nine depositions—has either issue come to light. There is simply no colorable reason why these documents would be relevant to Plaintiff’s case and, indeed, she has provided none.

4. Defendant Produced Responsive Documents.

Finally, Plaintiff asserts Defendant has not produced any documents responsive to RFP Nos. Nos. 20 and 67-88. This is inaccurate. Defendant produced all responsive, non-privileged documents located following a diligent search and reasonable inquiry pursuant to its responses to RFP Nos. 20, 73, 77, 80, 82, 83, and 87.

As for Plaintiff’s Request for Production, Set One, Plaintiff asserts Defendant’s production in response to RFP Nos. 3, 17, 21, 28, 40, 43, and 57 is “clearly incomplete.” The parties previously met and conferred regarding these responses, and Defendant has produced all responsive documents within its possession, custody, and control. Plaintiff has not since responded to Defendant’s written meet and confer letter, or explained why Defendant’s

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production is incomplete. Defendant is unable to properly respond as a result.

Of note, however, Plaintiff asserts Defendant has not produced all documents responsive to RFP No. 21, which seeks “the entire contents of the large file that was left on plaintiff’s desk on the day she was terminated, including, but not limited to, notes, documents, accountings and responses related to Margaret Smith’s complaints about plaintiff and the investigations of those complaints.” On February 1, 2024, Defendant produced *18 boxes* of documents—and later produced scanned copies—which contained the entirety of the documents Plaintiff left in her office. As Defendant’s counsel has explained to Plaintiff’s counsel, upon Plaintiff’s departure, court employees boxed every single document located in Plaintiff’s office and placed it in one of these 18 boxes. None of the documents were destroyed, re-organized, or altered in any way other than placing them in boxes. Defendant maintains photos and videos of Plaintiff’s office, both before and after boxing the documents, showing that all the documents were placed in the boxes. As Defendant has informed Plaintiff, if the documents she claims were left in her office were not in the 18 boxes produced for inspection, they are not within Defendant’s possession, custody, or control.

As for RFP No. 70, Defendant was unable to locate any responsive documents following a diligent search and inquiry and, thus, is unable to respond to the request.

We thank the Court for its attention to this matter, and look forward to resolving this dispute.

EXHIBIT A

1 CORRIE J. KLEKOWSKI (SBN 251338)

corrie.klekowski@quarles.com

2 **QUARLES & BRADY LLP**

101 West Broadway, Ninth Floor

3 San Diego, California 92101-8285

Telephone: 619-237-5200

4 Facsimile: 619-615-0700

5 Attorney for Defendants SUPERIOR COURT OF
THE STATE OF CALIFORNIA, COUNTY OF
6 SONOMA and SHELLY AVERILL

7
8 **UNITED STATES DISTRICT COURT**

9 **NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**

10
11 ARLENE D. JUNIOR,

12 Plaintiff,

13 v.

14 SUPERIOR COURT OF THE STATE OF
CALIFORNIA, COUNTY OF SONOMA,
15 and SHELLY AVERILL,

16 Defendants.

Case No. 22-cv-07270-WHO

**DEFENDANT SUPERIOR COURT OF
THE STATE OF CALIFORNIA, COUNTY
OF SONOMA'S RESPONSES TO
PLAINTIFF'S REQUEST FOR
PRODUCTION OF DOCUMENTS (SET
ONE)**

Judge:

Hon. William H. Orrick

Trial Date:

Not Set

17
18 PROPOUNDING PARTY: Plaintiff ARLENE JUNIOR

19 RESPONDING PARTY: Defendant SUPERIOR COURT OF THE STATE OF
20 CALIFORNIA, COUNTY OF SONOMA

21 SET NUMBER: ONE

22 Pursuant to Federal Rule of Civil Procedure 34, Defendant SUPERIOR COURT OF THE
23 STATE OF CALIFORNIA, COUNTY OF SONOMA ("Defendant") provides the following
24 written responses to Plaintiff ARLENE JUNIOR's request for production of documents:

25 **PRELIMINARY STATEMENT**

26 1. Nothing herein should be construed as an admission regarding the admissibility,
27 truth, accuracy or relevancy of any document.

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1 2. Defendant and its attorneys have not completed their discovery or preparation for
2 trial, nor have they concluded their analysis of information gathered to date. These responses
3 therefore are based upon information presently available to and known by Defendant.

4 3. It is possible that future discovery and independent investigation may supply
5 additional facts or information, add meaning to known facts and may establish new factual
6 conclusions and contentions, all of which may lead to additions, changes in, or variations from the
7 responses set forth herein.

8 4. These responses are made without prejudice to the right of Defendant to provide
9 supplemental, additional or different responses or evidence at the time of trial.

10 5. These responses include only those documents currently within Defendant's
11 possession, custody or control.

12 6. Defendant objects to all of Plaintiff's request for production of documents to the
13 extent they call for attorney-client communications and/or attorney work product. The inclusion
14 of this objection in a specific response does not waive it in those responses in which it is not
15 specifically included because this objection is incorporated into each and every response to
16 Plaintiff's request for production of documents.

17 Subject to the foregoing general comments and objections, which are incorporated into
18 each response to Plaintiff's request for production of documents, Defendant provides the
19 following responses:

20 **RESPONSES TO REQUEST FOR PRODUCTION OF DOCUMENTS**

21 **REQUEST FOR PRODUCTION NO. 1:**

22 Please produce plaintiff's entire personnel file, including any files kept separately by any
23 supervisor and/or by the Human Resources Division.

24 **RESPONSE TO REQUEST FOR PRODUCTION NO. 1:**

25 Objection. This request is overly broad and vague and ambiguous as to the phrase "any
26 files kept separately."

27 Subject to and without waiving the foregoing objections, Defendant responds as follows:

28 Defendant will produce Plaintiff's personnel file.

1 **REQUEST FOR PRODUCTION NO. 2:**

2 Please produce any and all files or documents pertaining to plaintiff's job performance,
3 including evaluations or discipline not included in her personnel files.

4 **RESPONSE TO REQUEST FOR PRODUCTION NO. 2:**

5 Objection. This request is overly broad and unduly burdensome in that it seeks any and all
6 files or documents pertaining to Plaintiff's job performance. This request is also vague and
7 ambiguous as to the phrase "pertaining to." This request seeks information protected by the
8 attorney-client privilege and/or attorney work product doctrine.

9 Subject to and without waiving the foregoing objections, Defendant responds as follows:

10 Defendant will produce any performance evaluations or written discipline of Plaintiff
11 during her employment, to the extent any exist that are not contained in her personnel file.

12 **REQUEST FOR PRODUCTION NO. 3:**

13 Please produce any written complaints pertaining to plaintiff's job performance, made by
14 anyone, at any time during plaintiff's employment with defendant Superior Court of California,
15 County of Sonoma (SCCS).

16 **RESPONSE TO REQUEST FOR PRODUCTION NO. 3:**

17 Objection. This request is overly broad in that it seeks any written complaints by anyone
18 at any time, without limitation as to scope. This request also seeks information that is protected by
19 the constitutional, statutory, or common law rights to privacy of third parties, including but not
20 limited to Article I, Section I of the California Constitution.

21 Subject to and without waiving the foregoing objections, Defendant responds as follows:

22 Defendant will produce written complaints submitted by any of Defendant's employees to
23 Judge Averill or its Human Resources department regarding Plaintiff during her employment.

24 **REQUEST FOR PRODUCTION NO. 4:**

25 Please produce all documents reflecting defendant SCCS's policies and procedures for
26 investigating employee complaints of hostile treatment, retaliation, racism and/or discrimination.

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1 **RESPONSE TO REQUEST FOR PRODUCTION NO. 4:**

2 Objection. This request is overbroad, unduly burdensome, and vague and ambiguous as to
3 the term “all documents reflecting.” This request seeks documents protected by attorney client
4 privilege and/or the attorney work product doctrine, and third parties’ privacy rights. Subject to
5 and without waiving these objections, Defendant responds as follows:

6 Defendant will produce its Court Personnel Plan.

7 **REQUEST FOR PRODUCTION NO. 5:**

8 Please produce all documents reflecting the guidelines under which plaintiff worked while
9 employed at the SCCS, including, but not limited to, personnel policies, employee handbooks,
10 procedure, and practices for hiring, promoting, evaluating, disciplining and terminating
11 employees, reporting and investigating discrimination, retaliation, and/or misconduct, for each
12 year during her employment with SCCS.

13 **RESPONSE TO REQUEST FOR PRODUCTION NO. 5:**

14 Objection. This request is overbroad, unduly burdensome, and vague and ambiguous as to
15 scope and as to the terms “all documents reflecting” and “guidelines.” This request seeks
16 documents protected by attorney client privilege and/or the attorney work product doctrine, and
17 third parties’ privacy rights. Subject to and without waiving these objections, Defendant responds
18 as follows:

19 Defendant will produce its Court Personnel Plan.

20 **REQUEST FOR PRODUCTION NO. 6:**

21 Please produce all documents reflecting the SCCS’s practices, policies and/or
22 recommendations regarding judicial conduct.

23 **RESPONSE TO REQUEST FOR PRODUCTION NO. 6:**

24 Objection. This request is overbroad, unduly burdensome, and vague and ambiguous as to
25 scope and as to the terms “all documents reflecting,” “recommendations,” and “judicial conduct.”
26 This request seeks documents protected by attorney client privilege and/or the attorney work
27 product doctrine, and third parties’ privacy rights. This request seeks information that is not
28 relevant to the claims and defenses in this matter.

1 Subject to and without waiving the foregoing objections, Defendant responds as follows:

2 Defendant will produce the California Code of Judicial Ethics.

3 **REQUEST FOR PRODUCTION NO. 7:**

4 Please produce all documents reflecting the SCCS's practices, policies and/or
5 recommendations regarding whistleblowing.

6 **RESPONSE TO REQUEST FOR PRODUCTION NO. 7:**

7 Objection. This request is overbroad, unduly burdensome, and vague and ambiguous as to
8 scope and as to the terms "all documents reflecting" and "recommendations." This request seeks
9 documents protected by attorney client privilege and/or the attorney work product doctrine, and
10 third parties' privacy rights.

11 Subject to and without waiving the foregoing objections, Defendant responds as follows:

12 Defendant will produce its Court Personnel Plan.

13 **REQUEST FOR PRODUCTION NO. 8:**

14 Please produce all documents reflecting the SCCS's practices, policies and/or
15 recommendations regarding discrimination.

16 **RESPONSE TO REQUEST FOR PRODUCTION NO. 8:**

17 Objection. This request is overbroad, unduly burdensome, and vague and ambiguous as to
18 scope and as to the terms "all documents reflecting" and "recommendations." This request seeks
19 documents protected by attorney client privilege and/or the attorney work product doctrine, and
20 third parties' privacy rights.

21 Subject to and without waiving the foregoing objections, Defendant responds as follows:

22 Defendant will produce its Court Personnel Plan.

23 **REQUEST FOR PRODUCTION NO. 9:**

24 Please produce all documents reflecting the SCCS's practices, policies and/or
25 recommendations regarding retaliation.

26 **RESPONSE TO REQUEST FOR PRODUCTION NO. 9:**

27 Objection. This request is overbroad, unduly burdensome, and vague and ambiguous as to
28 scope and as to the terms "all documents reflecting" and "recommendations." This request seeks

documents protected by attorney client privilege and/or the attorney work product doctrine, and third parties' privacy rights.

Subject to and without waiving the foregoing objections, Defendant responds as follows:

Defendant will produce its Court Personnel Plan.

REQUEST FOR PRODUCTION NO. 10:

Please produce all documents reflecting the SCCS's practices, policies and/or recommendations regarding termination of employment.

RESPONSE TO REQUEST FOR PRODUCTION NO. 10:

Objection. This request is overbroad, unduly burdensome, and vague and ambiguous as to scope and as to the terms "all documents reflecting" and "recommendations." This request seeks documents protected by attorney client privilege and/or the attorney work product doctrine, and third parties' privacy rights.

Subject to and without waiving the foregoing objections, Defendant responds as follows:

Defendant will produce its Court Personnel Plan.

REQUEST FOR PRODUCTION NO. 11:

Please produce all documents reflecting the SCCS's policies and/or procedures regarding court personnel performance reviews or evaluations and performance improvement plans.

RESPONSE TO REQUEST FOR PRODUCTION NO. 11:

Objection. This request is overbroad, unduly burdensome, and vague and ambiguous as to scope and as to the terms "all documents reflecting." This request seeks documents protected by attorney client privilege and/or the attorney work product doctrine, and third parties' privacy rights.

Subject to and without waiving the foregoing objections, Defendant responds as follows:

Defendant will produce its Court Personnel Plan.

REQUEST FOR PRODUCTION NO. 12:

Please produce all calendar entries for meetings scheduled between plaintiff and Judge Shelly Averill.

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1 **RESPONSE TO REQUEST FOR PRODUCTION NO. 12:**

2 Objection. This request seeks information that is not relevant to the claims or defenses in
3 this matter. This request is also overbroad in that it is not limited to time or scope. This request is
4 also vague and ambiguous as to the phrase “calendar entries.”

5 Subject to and without waiving the foregoing objections, Defendant responds as follows:

6 Defendant will produce Outlook calendar entries reflecting meetings consisting of Plaintiff
7 and Judge Shelly Averill during Plaintiff’s employment.

8 **REQUEST FOR PRODUCTION NO. 13:**

9 Please produce all calendar entries for meetings scheduled between plaintiff and Judge
10 Bradford Demeo.

11 **RESPONSE TO REQUEST FOR PRODUCTION NO. 13:**

12 Objection. This request seeks information that is not relevant to the claims or defenses in
13 this matter. This request is also overbroad in that it is not limited in time or scope. This request is
14 also vague and ambiguous as to the phrase “calendar entries” and the term “between.”

15 Subject to and without waiving the foregoing objections, Defendant responds as follows:

16 Defendant will produce Outlook calendar entries reflecting meetings consisting of Plaintiff
17 and Judge Bradford DeMeo from January 1, 2021 to Plaintiff’s termination. After a diligent
18 search and reasonable inquiry, Defendant is unable to access calendar entries reflecting meetings
19 consisting of Plaintiff and Judge Bradford DeMeo prior to January 1, 2021.

20 **REQUEST FOR PRODUCTION NO. 14:**

21 Please produce all calendar entries for meetings scheduled between plaintiff and any
22 Human Resources Division staff.

23 **RESPONSE TO REQUEST FOR PRODUCTION NO. 14:**

24 Objection. This request is neither relevant nor reasonably likely to lead to the discovery of
25 admissible evidence. This request is also overbroad and unduly burdensome in that it is not
26 limited in time or scope. This request is also vague and ambiguous as to the phrase “calendar
27 entries.”

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1 Subject to and without waiving the foregoing objections, Defendant responds as follows:

2 Defendant will produce Outlook calendar entries reflecting meetings between Plaintiff and
3 Letitia DiMeola during Plaintiff's employment.

4 **REQUEST FOR PRODUCTION NO. 15:**

5 Please produce all of Judge Shelly Averill's notes from meetings with plaintiff.

6 **RESPONSE TO REQUEST FOR PRODUCTION NO. 15:**

7 Objection. This request seeks information outside the scope of discovery in that it seeks
8 information that is irrelevant to the claims or defenses in this matter. This request is also
9 overbroad in that it is not limited in time or scope.

10 Subject to and without waiving the foregoing objections, Defendant responds as follows:

11 Defendant produced Judge Shelly Averill's notes from meetings with Plaintiff on February
12 17, 2023 (Bates numbered SCSC_000001-SCSC_000710). Defendant will produce any additional
13 notes in Defendant's possession, custody, or control, taken by Judge Shelly Averill from meetings
14 with Plaintiff regarding the events alleged in her complaint.

15 **REQUEST FOR PRODUCTION NO. 16:**

16 Please produce all of Judge Bradford Demeo's notes from meetings with plaintiff.

17 **RESPONSE TO REQUEST FOR PRODUCTION NO. 16:**

18 Objection. This request seeks information outside the scope of discovery in that it seeks
19 information that is irrelevant to the claims or defenses in this matter. This request is also
20 overbroad and unduly burdensome in that it is not limited in time or scope.

21 Subject to and without waiving the foregoing objections, Defendant responds as follows:

22 Defendant will produce notes in Defendant's possession, custody, or control, taken by
23 Judge Bradford DeMeo from meetings with Plaintiff regarding the events alleged in her
24 complaint.

25 **REQUEST FOR PRODUCTION NO. 17:**

26 Please produce all documents and/or communications between plaintiff, her managers,
27 and/or any Human Resources Division staff, and/or any individuals from the California Judicial
28 Council regarding plaintiff and/or her job performance.

RESPONSE TO REQUEST FOR PRODUCTION NO. 17:

Objection. This request is compound, overly broad, and unduly burdensome in that it seeks all documents and/or communications regarding Plaintiff and/or her job performance. This request is also vague and ambiguous in that it is unclear whether it seeks communications between Plaintiff and other specified employees of Defendant, or communications between any and all specified employees of Defendant. This request is vague and ambiguous as to the phrases “individuals from the California Judicial Council” and “her job performance.” This request seeks information protected by the attorney-client privilege and/or attorney work product doctrine.

Subject to and without waiving the foregoing objections, Defendant responds as follows:

Defendant will produce any performance evaluations of Plaintiff during her employment.

REQUEST FOR PRODUCTION NO. 18:

Please produce all documents and/or communications between plaintiff, her managers, and/or any Human Resources Division staff regarding plaintiff’s relationship with or conduct in relation to Margaret Smith.

RESPONSE TO REQUEST FOR PRODUCTION NO. 18:

Objection. This request is overbroad and unduly burdensome and is vague and ambiguous in that it is unclear whether it seeks communications between Plaintiff and other specified employees of Defendant, or communications between any and all specified employees of Defendant. This request is also vague and ambiguous as to the phrase “relationship with or conduct in relation to.” This request seeks information that may be protected by the attorney-client privilege and/or attorney work product doctrine. This request also seeks information that is protected by the constitutional, statutory, or common law rights to privacy of third parties, including but not limited to Article I, Section I of the California Constitution.

Subject to and without waiving the foregoing objections, Defendant responds as follows:

Defendant will produce documents in its possession, custody, and control containing communications regarding Margaret Smith’s job performance that were exchanged between Plaintiff and Judge Shelly Averill, or exchanged between Plaintiff and Defendant’s Human Resources employees.

REQUEST FOR PRODUCTION NO. 19:

Please produce all documents concerning investigations of any complaints about plaintiff, including, but not limited to, email communications, documents provided to the investigator(s), notes and/or recordings of all witness interviews, and all findings and/or reports.

RESPONSE TO REQUEST FOR PRODUCTION NO. 19:

Objection. This request is overbroad, unduly burdensome, and vague and ambiguous as to scope and as to the terms “all documents concerning.” This request seeks information protected by the attorney-client privilege and/or attorney work product doctrine. Subject to and without waiving these objections, Defendant responds:

Defendant produced documents in its possession, custody, or control which were relied on as part of the investigations regarding Margaret Smith’s complaints about Plaintiff on February 17, 2023. Defendant will produce any additional documents in its possession, custody, or control which were relied on as part of the investigations into Margaret Smith’s complaints about Plaintiff.

REQUEST FOR PRODUCTION NO. 20:

Please produce all documents concerning investigations of any complaints made by plaintiff regarding racism and/or discrimination at SCCS, including but not limited to email communications, documents provided to the investigator(s), notes and/or recordings of all witness interviews, and all findings and/or reports.

RESPONSE TO REQUEST FOR PRODUCTION NO. 20:

Objection. This request is overbroad, unduly burdensome, and vague and ambiguous as to scope and as to the terms “all documents concerning.” This request seeks information protected by the attorney-client privilege and/or attorney work product doctrine. Subject to and without waiving these objections, Defendant responds:

Defendant will produce any documents in its possession, custody, or control which were relied on as part of the investigations into Plaintiff’s complaint of discrimination.

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1 **REQUEST FOR PRODUCTION NO. 21:**

2 Please provide the entire contents of the large file that was left on plaintiff's desk the day
3 she was terminated, including, but not limited to, notes, documents, accountings and responses
4 related to Margaret Smith's complaints about plaintiff and the investigations of those complaints.

5 **RESPONSE TO REQUEST FOR PRODUCTION NO. 21:**

6 Objection. This request is vague, ambiguous, and unintelligible as to "the large file that
7 was left on plaintiff's desk."

8 **REQUEST FOR PRODUCTION NO. 22:**

9 Please produce all text messages between plaintiff and Judge Bradford Demeo.

10 **RESPONSE TO REQUEST FOR PRODUCTION NO. 22:**

11 Objection. This request seeks information equally available to Plaintiff. This request is
12 overbroad in that it is not limited in time or scope. This request also seeks information that is
13 protected by the constitutional, statutory, or common law rights to privacy of third parties,
14 including but not limited to Article I, Section I of the California Constitution.

15 Subject to and without waiving the foregoing objections, Defendant responds as follows:

16 Defendant has conducted a diligent search and reasonable inquiry and has determined that
17 no responsive documents exist in Defendant's possession, custody, or control.

18 **REQUEST FOR PRODUCTION NO. 23:**

19 Please produce all text messages between plaintiff and Judge Shelly Averill.

20 **RESPONSE TO REQUEST FOR PRODUCTION NO. 23:**

21 Objection. This request seeks information equally available to Plaintiff. This request is
22 overbroad in that it is not limited in time or scope. This request also seeks information that is
23 protected by the constitutional, statutory, or common law rights to privacy of third parties,
24 including but not limited to Article I, Section I of the California Constitution.

25 Subject to and without waiving the foregoing objections, Defendant responds as follows:

26 Defendant has conducted a diligent search and reasonable inquiry and has determined that
27 no responsive documents exist in Defendant's possession, custody, or control.

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1 **REQUEST FOR PRODUCTION NO. 24:**

2 Please produce all text messages between Margaret Smith and Judge Shelly Averill
3 regarding plaintiff's job performance and/or Margaret Smith's complaints about plaintiff.

4 **RESPONSE TO REQUEST FOR PRODUCTION NO. 24:**

5 Objection. This request seeks information that is protected by the constitutional, statutory,
6 or common law rights to privacy of third parties, including but not limited to Article I, Section I of
7 the California Constitution.

8 Subject to and without waiving the foregoing objections, Defendant responds as follows:

9 Defendant has conducted a diligent search and reasonable inquiry and has determined that
10 no responsive documents exist in Defendant's possession, custody, or control.

11 **REQUEST FOR PRODUCTION NO. 25:**

12 Please produce all text messages between Margaret Smith and Judge Bradford Demeo
13 regarding plaintiff's job performance and/or Margaret Smith's complaints about plaintiff.

14 **RESPONSE TO REQUEST FOR PRODUCTION NO. 25:**

15 Objection. This request seeks information that is protected by the constitutional, statutory,
16 or common law rights to privacy of third parties, including but not limited to Article I, Section I of
17 the California Constitution.

18 Subject to and without waiving the foregoing objections, Defendant responds as follows:

19 Defendant has conducted a diligent search and reasonable inquiry and has determined that
20 no responsive documents exist in Defendant's possession, custody, or control.

21 **REQUEST FOR PRODUCTION NO. 26:**

22 Please produce all text messages between Judge Shelly Averill and Judge Bradford Demeo
23 regarding any aspect of plaintiff's job performance and/or Margaret Smith's complaints about
24 plaintiff.

25 **RESPONSE TO REQUEST FOR PRODUCTION NO. 26:**

26 Objection. This request seeks information that is protected by the constitutional, statutory,
27 or common law rights to privacy of third parties, including but not limited to Article I, Section I of
28 the California Constitution.

1 Subject to and without waiving the foregoing objections, Defendant responds as follows:

2 Defendant has conducted a diligent search and reasonable inquiry and has determined that
3 no responsive documents exist in Defendant's possession, custody, or control.

4 **REQUEST FOR PRODUCTION NO. 27:**

5 Please produce all email communications between Judge Shelly Averill and Judge
6 Bradford Demeo regarding any aspect of plaintiff's job performance and/or Margaret Smith's
7 complaints about plaintiff.

8 **RESPONSE TO REQUEST FOR PRODUCTION NO. 27:**

9 Objection. This request is impermissibly compound. This request is vague and
10 ambiguous, overbroad, and unduly burdensome in that it seeks all email communications
11 regarding "any aspect" of Plaintiff's job performance, as well as "any aspect" of Margaret Smith's
12 complaints about Plaintiff.

13 Subject to and without waiving the foregoing objections, Defendant responds as follows:

14 Defendant will produce Plaintiff's performance evaluations, if any, as well as any email
15 communications between Judge Shelly Averill and Judge DeMeo discussing Margaret Smith's
16 submitted complaints about Plaintiff.

17 **REQUEST FOR PRODUCTION NO. 28:**

18 Please produce all email communications between Margaret Smith and Judge Bradford
19 Demeo, and/or Judge Shelly Averill, and/or Judge Robert LaForge regarding any aspect of
20 plaintiff's job performance and/or Margaret Smith's complaints about plaintiff.

21 **RESPONSE TO REQUEST FOR PRODUCTION NO. 28:**

22 Objection. This request is impermissibly compound, overbroad and unduly burdensome in
23 that it seeks all email communications regarding "any aspect" of Plaintiff's job performance. This
24 request is overbroad and unduly burdensome and is vague and ambiguous in that it is unclear
25 whether it seeks communications between Plaintiff and other specified employees of Defendant,
26 or communications between any and all specified employees of Defendant.

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1 **REQUEST FOR PRODUCTION NO. 29:**

2 Please produce all email communications between plaintiff and Judge Bradford Demeo
3 regarding any aspect of plaintiff's job performance and/or Margaret Smith's complaints about
4 plaintiff

5 **RESPONSE TO REQUEST FOR PRODUCTION NO. 29:**

6 Objection. This request is overbroad and unduly burdensome in that it seeks all email
7 communications regarding "any aspect" of Plaintiff's job performance.

8 Subject to and without waiving the foregoing objections, Defendant responds as follows:

9 Defendant will produce any emails between Plaintiff and Judge DeMeo in which Judge
10 DeMeo provides feedback on Plaintiff's job performance, and emails between Plaintiff and Judge
11 DeMeo discussing Margaret Smith's submitted complaints about Plaintiff.

12 **REQUEST FOR PRODUCTION NO. 30:**

13 Please produce all email communications between plaintiff and Judge Shelly Averill
14 regarding any aspect of plaintiff's job performance and/or Margaret Smith's complaints about
15 plaintiff.

16 **RESPONSE TO REQUEST FOR PRODUCTION NO. 30:**

17 Objection. This request is overbroad and unduly burdensome in that it seeks all email
18 communications regarding "any aspect" of Plaintiff's job performance.

19 Subject to and without waiving the foregoing objections, Defendant responds as follows:

20 Defendant will produce any emails between Plaintiff and Judge Averill in which Judge
21 Averill provides feedback on Plaintiff's job performance, and emails between Plaintiff and Judge
22 Averill discussing Margaret Smith's submitted complaints about Plaintiff.

23 **REQUEST FOR PRODUCTION NO. 31:**

24 Please produce all email communications between plaintiff, from her SCCS email account
25 and every other email account, and any other person regarding the recording of Judge Robert
26 LaForge's remarks, posted to the Court's YouTube page in or around May 2021, and the May 4,
27 2021 complaint by a member of the public regarding the recording.

28 ///

RESPONSE TO REQUEST FOR PRODUCTION NO. 31:

Objection. This request is overbroad and unduly burdensome in that it seeks communications between Plaintiff and any other person. This request seeks information equally available to Plaintiff. This request also seeks information that is protected by the constitutional, statutory, or common law rights to privacy of third parties, including but not limited to Article I, Section I of the California Constitution. This request is vague and ambiguous as to the phrase “every other email account.”

Subject to and without waiving the foregoing objections, Defendant responds as follows:

Defendant will produce any emails between Plaintiff and its Human Resources department regarding the recording of Judge Robert LaForge’s remarks posted to the Court’s YouTube page on or around May 2021, and regarding the May 4, 2021 complaint by a member of the public regarding the recording.

REQUEST FOR PRODUCTION NO. 32:

Please produce all email communications between Judge Bradford Demeo and Judge Robert LaForge regarding the recording of Judge LaForge’s remarks posted to the Court’s YouTube page, in or around May 2021, and the May 4, 2021, complaint by a member of the public regarding the recording, and/or plaintiff’s concerns regarding the recording.

RESPONSE TO REQUEST FOR PRODUCTION NO. 32:

Objection. This request seeks information that is protected by the constitutional, statutory, or common law rights to privacy of third parties, including but not limited to Article I, Section I of the California Constitution. This request seeks documents that are not relevant to the claims or defenses at issue in this case. This request is vague, ambiguous, and overbroad as to the phrase “plaintiff’s concerns regarding the recording.”

Subject to and without waiving the foregoing objections, Defendant responds as follows:

Defendant will produce any emails between Judge DeMeo and Judge LaForge regarding the recording of Judge Robert LaForge’s remarks posted to the Court’s YouTube page on or around May 2021, and regarding the May 4, 2021 complaint by a member of the public regarding the recording.

1 **REQUEST FOR PRODUCTION NO. 33:**

2 Please produce all documents regarding Judge Robert LaForge's self reporting to the
3 Commission on Judicial Performance regarding the recording of his remarks posted to the Court's
4 YouTube page, in or around May 2021, and the May 4, 2021 complaint by a member of the public
5 regarding the recording

6 **RESPONSE TO REQUEST FOR PRODUCTION NO. 33:**

7 Objection. This request seeks information that is protected by the constitutional, statutory,
8 or common law rights to privacy of third parties, including but not limited to Article I, Section I of
9 the California Constitution. This request seeks documents that are not relevant to the claims or
10 defenses in this case. This request is overbroad and unduly burdensome, as this request seeks "all
11 documents regarding" Judge Robert LaForge's self-reporting. This request assumes facts in that it
12 assumes Judge Robert LaForge self-reported to the Commission on Judicial Performance. This
13 request seeks information protected by the attorney-client privilege and/or attorney work product
14 doctrine.

15 Subject to and without waiving the foregoing objections, Defendant responds as follows:

16 After a diligent search and reasonable inquiry, no such documents are in Defendant's
17 possession, custody, or control.

18 **REQUEST FOR PRODUCTION NO. 34:**

19 Please produce all email communications between Judge Shelly Averill and Judge Robert
20 LaForge regarding any aspect of plaintiff's job performance and/or Margaret Smith's complaints
21 regarding plaintiff.

22 **RESPONSE TO REQUEST FOR PRODUCTION NO. 34:**

23 Objection. This request is overly broad and unduly burdensome in that it seeks
24 communications regarding "any aspect" of Plaintiff's job performance and Margaret Smith's
25 complaints regarding Plaintiff.

26 Subject to and without waiving the foregoing objections, Defendant responds as follows:

27 Defendant will produce Plaintiff's performance evaluations, as well as any emails between
28 Judge LaForge and Judge Averill discussing Margaret Smith's submitted complaints about

1 Plaintiff.

2 **REQUEST FOR PRODUCTION NO. 35:**

3 Please produce all emails and/or other documents referenced by Margaret Smith in any of
4 her complaints and/or logs regarding her treatment by and/or interactions with plaintiff.

5 **RESPONSE TO REQUEST FOR PRODUCTION NO. 35:**

6 Objection. This request is overly broad and unduly burdensome. This request is vague
7 and ambiguous, as Margaret Smith's complaints and/or logs often refer only vaguely to emails
8 and/or other documents.

9 Subject to and without waiving the foregoing objections, Defendant responds as follows:

10 Defendant will produce emails submitted by Margaret Smith as part of the investigation
11 into Ms. Smith's complaints about Plaintiff.

12 **REQUEST FOR PRODUCTION NO. 36:**

13 Please produce all documents, including email communications, between Judge Shelly
14 Averill and/or Judge Robert LaForge and/or Kwesi Williams and/or any SCCS employee,
15 regarding Judge LaForge's instruction to Williams regarding the assignment of a court reporter in
16 April 2022.

17 **RESPONSE TO REQUEST FOR PRODUCTION NO. 36:**

18 Objection. This request seeks information that is protected by the constitutional, statutory,
19 or common law rights to privacy of third parties, including but not limited to Article I, Section I of
20 the California Constitution. This request is vague and ambiguous as to the phrases "all
21 documents, including email communications between" and "assignment of a court reporter in
22 April 2022." This request seeks information protected by the attorney-client privilege and/or
23 attorney work product doctrine. This request seeks information that is outside the scope of
24 discovery because it is not relevant to the claims or defenses in this matter. This request is
25 impermissibly compound. This request is overbroad and unduly burdensome and is vague and
26 ambiguous in that it is unclear whether it seeks communications between Plaintiff and other
27 specified employees of Defendant, or communications between any and all specified employees of
28 Defendant.

1 Subject to and without waiving the foregoing objections, Defendant responds as follows:

2 Defendant will produce emails reflecting the April 28, 2022 communication from Judge
3 Robert LaForge's assistant to Kwesi Williams regarding the assignment of court reporter Kathy
4 Langstaff.

5 **REQUEST FOR PRODUCTION NO. 37:**

6 Please produce any and all files or documents pertaining to Margaret Smith's job
7 performance, including, but not limited to, evaluations and disciplinary actions and investigations.

8 **RESPONSE TO REQUEST FOR PRODUCTION NO. 37:**

9 Objection. This request seeks information that may be protected by the attorney-client
10 privilege and/or attorney work product doctrine. This request also seeks information that is
11 protected by the constitutional, statutory, or common law rights to privacy of third parties,
12 including but not limited to Article I, Section I of the California Constitution. This request is
13 vague, overly broad, and unduly burdensome in that it seeks "any and all files or documents
14 pertaining to."

15 **REQUEST FOR PRODUCTION NO. 38:**

16 Please produce any written complaints pertaining to Margaret Smith's job performance,
17 made by anyone, at any time during her employment with defendant Superior Court of California,
18 County of Sonoma's (SCCS).

19 **RESPONSE TO REQUEST FOR PRODUCTION NO. 38:**

20 Objection. This request is vague and ambiguous as to the terms "written complaints" and
21 "pertaining to." This request is overbroad in that it seeks written complaints made by any one at
22 any time.

23 Subject to and without waiving the foregoing objections, Defendant responds as follows:

24 Defendant will produce email communications discussing Margaret Smith's job
25 performance that were exchanged between Plaintiff and Shelly Averill, and exchanged between
26 Plaintiff and Defendant's Human Resources employees.

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28 ///

1 **REQUEST FOR PRODUCTION NO. 39:**

2 Please produce all email communications between plaintiff and Margaret Smith pertaining
3 to Ms. Smith's job performance.

4 **RESPONSE TO REQUEST FOR PRODUCTION NO. 39:**

5 Objection. This request is vague and ambiguous as to the phrases "pertaining to" and "job
6 performance."

7 Subject to and without waiving the foregoing objections, Defendant responds as follows:

8 Defendant will produce email communications between Plaintiff and Margaret Smith in
9 which Plaintiff provided feedback on Ms. Smith's job performance.

10 **REQUEST FOR PRODUCTION NO. 40:**

11 Please produce the digital calendar entries associated with plaintiff's SCCS email account.

12 **RESPONSE TO REQUEST FOR PRODUCTION NO. 40:**

13 Objection. This request seeks information that is not relevant to the claims or defenses in
14 this matter. This request is overbroad and unduly burdensome in that it is not limited in time or
15 scope.

16 Subject to and without waiving the foregoing objections, Defendant responds as follows:

17 Defendant will produce Outlook calendar entries on Plaintiff's calendar from January 1,
18 2020 to the present.

19 **REQUEST FOR PRODUCTION NO. 41:**

20 Please produce the organizational chart(s) of the SCCS for the time period between
21 October 2017 and May 2022.

22 **RESPONSE TO REQUEST FOR PRODUCTION NO. 41:**

23 Objection. This request seeks information that is not relevant to the claims or defenses in
24 this matter.

25 Subject to and without waiving the foregoing objections, Defendant responds as follows:

26 Defendant will produce any responsive, non-privileged documents discovered following a
27 diligent search and reasonable inquiry.

28 ///

1 **REQUEST FOR PRODUCTION NO. 42:**

2 Please produce any internal and/or external reports or assessments of the work
3 environment at SCCS produced between 2017 and 2022.

4 **RESPONSE TO REQUEST FOR PRODUCTION NO. 42:**

5 Objection. This request seeks information that is outside the scope of discovery because it
6 is not relevant to the claims or defenses in this matter. This request also seeks information that is
7 protected by the constitutional, statutory, or common law rights to privacy of third parties,
8 including but not limited to Article I, Section I of the California Constitution. This request seeks
9 information protected by the attorney-client privilege and/or attorney work product doctrine.

10 **REQUEST FOR PRODUCTION NO. 43:**

11 Please produce all documents that reflect the reasons for defendants' decision to terminate
12 plaintiff.

13 **RESPONSE TO REQUEST FOR PRODUCTION NO. 43:**

14 Objection. This request is overbroad and unduly burdensome in that it seeks "all
15 documents that reflect." This request seeks information protected by the attorney-client privilege
16 and/or attorney work product doctrine.

17 Subject to and without waiving these objections, Defendant responds:

18 Defendant produced documents relied on in its investigation into Margaret Smith's
19 complaints about Plaintiff on February 17, 2023 (Bates numbered 000001-SCSC_000710).
20 Defendant will produce any additional documents in its possession, custody, or control which
21 were relied on as part of the investigations into Margaret Smith's complaints about Plaintiff.

22 **REQUEST FOR PRODUCTION NO. 44:**

23 Please produce all notes of all employees of defendant SCCS, who participated in the
24 decision to terminate plaintiff's employment, regarding the decision to terminate her employment,
25 including notes from all meetings regarding any aspect of plaintiff's employment and/or job
26 performance

27 ///

28 ///

RESPONSE TO REQUEST FOR PRODUCTION NO. 44:

Objection. This request seeks information protected by the attorney-client privilege and/or attorney work product doctrine. This request is overbroad in that it seeks “notes from all meetings regarding any aspect of plaintiff’s employment.”

REQUEST FOR PRODUCTION NO. 45:

Please produce all documents concerning the termination of plaintiff, including, but not limited to, all documents relied upon, all communications between and among individuals regarding the decision to terminate plaintiff, all documents that any of defendant SCCS’s employees prepared with respect to the termination, all interviews with any and all persons regarding the facts that led to the termination, and all evidence that supported the termination

RESPONSE TO REQUEST FOR PRODUCTION NO. 45:

Objection. This request seeks information protected by the attorney-client privilege and/or attorney work product doctrine. This request is vague and overly broad as to the phrase “all documents concerning.”

Subject to and without waiving these objections, Defendant responds:

Defendant produced documents relied on in the investigations into Margaret Smith’s complaints about Plaintiff, and the investigation into whether Plaintiff misrepresented the reason a court employee resigned, on February 17, 2023 (Bates numbered 000001-SCSC_000710). Defendant will produce any additional documents in its possession, custody, or control which were relied on as part of the investigations into Margaret Smith’s complaints about Plaintiff, as well as the investigation into whether Plaintiff misrepresented the reason a court employee resigned.

REQUEST FOR PRODUCTION NO. 46:

Please produce documents reflecting plaintiff’s annual compensation and benefits for each year of her employment with SCCS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 46:

Objection. This request is vague and ambiguous as to the phrase “documents reflecting plaintiff’s annual compensation and benefits.”

1 Subject to and without waiving the foregoing objections, Defendant responds as follows:

2 Defendant will produce Plaintiff's payroll records.

3 **REQUEST FOR PRODUCTION NO. 47:**

4 Please produce documents reflecting each type of benefit to which plaintiff would have
5 been entitled had she not been terminated and had she remained as Chief Executive Officer, from
6 the date of her termination to the present, including but not limited to, the amounts SCCS would
7 have paid to provide each benefit and the value of each benefit to plaintiff.

8 **RESPONSE TO REQUEST FOR PRODUCTION NO. 47:**

9 Objection. This request is vague and ambiguous as to the phrase "type of benefit."

10 Subject to and without waiving the foregoing objections, Defendant responds as follows:

11 Defendant will produce its Court Personnel Plan.

12 **REQUEST FOR PRODUCTION NO. 48:**

13 Please produce the Code of Ethics for the Court Employees of California, referenced by
14 defendants in their Initial Disclosures.

15 **RESPONSE TO REQUEST FOR PRODUCTION NO. 48:**

16 Defendant will produce all responsive, non-privileged documents discovered following a
17 diligent search and reasonable inquiry.

18 **REQUEST FOR PRODUCTION NO. 49:**

19 Please produce the October 24, 2021, Executive Summary of Investigative Findings
20 created by investigations law firm Van Dermyden Makus, referenced by defendants in their Initial
21 Disclosures.

22 **RESPONSE TO REQUEST FOR PRODUCTION NO. 49:**

23 Objection. This request seeks information protected by the attorney-client privilege and/or
24 attorney work product doctrine. This request also seeks information that is protected by the
25 constitutional, statutory, or common law rights to privacy of third parties, including but not limited
26 to Article I, Section I of the California Constitution.

27 Subject to and without waiving the foregoing objections, Defendant responds as follows:

28 Defendant will produce all responsive, non-privileged documents located following a

1 diligent search and reasonable inquiry.

2 **REQUEST FOR PRODUCTION NO. 50:**

3 Please produce the March 30, 2022, Executive Summary of Investigative Findings created
4 by investigations law firm Van Dermynen Makus, referenced by defendants in their Initial
5 Disclosures.

6 **RESPONSE TO REQUEST FOR PRODUCTION NO. 50:**

7 Objection. This request seeks information protected by the attorney-client privilege and/or
8 attorney work product doctrine. This request also seeks information that is protected by the
9 constitutional, statutory, or common law rights to privacy of third parties, including but not limited
10 to Article I, Section I of the California Constitution.

11 Subject to and without waiving the foregoing objections, Defendant responds as follows:

12 Defendant will produce all responsive, non-privileged documents located following a
13 diligent search and reasonable inquiry.

14 **REQUEST FOR PRODUCTION NO. 51:**

15 Please produce the April 12, 2022, Executive Summary of Investigative Findings created
16 by investigations law firm Van Dermynen Makus, referenced by defendants in their Initial
17 Disclosures.

18 **RESPONSE TO REQUEST FOR PRODUCTION NO. 51:**

19 Objection. This request seeks information protected by the attorney-client privilege and/or
20 attorney work product doctrine. This request also seeks information that is protected by the
21 constitutional, statutory, or common law rights to privacy of third parties, including but not limited
22 to Article I, Section I of the California Constitution.

23 Subject to and without waiving the foregoing objections, Defendant responds as follows:

24 Defendant will produce all responsive, non-privileged documents located following a
25 diligent search and reasonable inquiry.

26 **REQUEST FOR PRODUCTION NO. 52:**

27 Please produce plaintiff's 52-page response to Margaret Smith's Complaint Log,
28 referenced by defendants in their Initial Disclosures.

1 **RESPONSE TO REQUEST FOR PRODUCTION NO. 52:**

2 Objection. This request is vague and ambiguous as to the phrase “plaintiff’s 52-page
3 response.”

4 Subject to and without waiving the foregoing objections, Defendant responds as follows:

5 Defendant will produce all responsive, non-privileged documents discovered following a
6 diligent search and reasonable inquiry.

7 **REQUEST FOR PRODUCTION NO. 53:**

8 Please produce the Memorandum titled “Presiding Judges’ Luncheon Court Update”
9 prepared by plaintiff for Judge Nadler’s address in 2019, referenced by defendants in their Initial
10 Disclosures.

11 **RESPONSE TO REQUEST FOR PRODUCTION NO. 53:**

12 Defendant will produce any responsive, non-privileged documents discovered following a
13 diligent search and reasonable inquiry.

14 **REQUEST FOR PRODUCTION NO. 54:**

15 Please produce the May 25, 2020, email from plaintiff to a list of court managers and
16 justice partners, referenced by defendants in their Initial Disclosures.

17 **RESPONSE TO REQUEST FOR PRODUCTION NO. 54:**

18 Defendant will produce a May 26, 2020 email from Plaintiff to a list of court managers and
19 justice partners, which was incorrectly referenced as a May 25, 2020 email in Defendants’ initial
20 disclosures.

21 **REQUEST FOR PRODUCTION NO. 55:**

22 Please produce the June 8, 2020, email from plaintiff to court staff regarding a Black Lives
23 Matter rally, referenced by defendants in their Initial Disclosures.

24 **RESPONSE TO REQUEST FOR PRODUCTION NO. 55:**

25 Defendant will produce all responsive, non-privileged documents discovered following a
26 diligent search and reasonable inquiry.

27 ///

28 ///

1 **REQUEST FOR PRODUCTION NO. 56:**

2 Please produce the March 2, 2021, email from Judge Demeo to plaintiff, referenced by
3 defendants in their Initial Disclosures

4 **RESPONSE TO REQUEST FOR PRODUCTION NO. 56:**

5 Defendant will produce all responsive, non-privileged documents discovered following a
6 diligent search and reasonable inquiry.

7 **REQUEST FOR PRODUCTION NO. 57:**

8 Please produce the email announcing the 2021 Presiding Judge's Luncheon, referenced by
9 defendants in their Initial Disclosures.

10 **RESPONSE TO REQUEST FOR PRODUCTION NO. 57:**

11 Defendant will produce all responsive, non-privileged documents discovered following a
12 diligent search and reasonable inquiry.

13 **REQUEST FOR PRODUCTION NO. 58:**

14 Please produce the voicemail left by Judge Demeo for plaintiff regarding a call he had
15 received from Margaret Smith and the Presiding Judge's Luncheon, referenced by defendants in
16 their Initial Disclosures.

17 **RESPONSE TO REQUEST FOR PRODUCTION NO. 58:**

18 Objection. This request seeks information equally available to Plaintiff.

19 Defendant is unable to respond to this request as it is unable to access voicemails sent to
20 Plaintiff in 2021.

21 **REQUEST FOR PRODUCTION NO. 59:**

22 Please produce the April 5, 2021, Executive Committee and Executive Officer meeting
23 minutes, referenced by defendants in their Initial Disclosures.

24 **RESPONSE TO REQUEST FOR PRODUCTION NO. 59:**

25 Defendant will produce all responsive, non-privileged documents located following a
26 diligent search and reasonable inquiry.

27 ///

28 ///

1 **REQUEST FOR PRODUCTION NO. 60:**

2 Please produce the email with the subject line “FW Colleen - PLEASE READ ASAP
3 091819”, referenced by defendants in their Initial Disclosures.

4 **RESPONSE TO REQUEST FOR PRODUCTION NO. 60:**

5 Objection. This request seeks information that is protected by the constitutional, statutory,
6 or common law rights to privacy of third parties, including but not limited to Article I, Section I of
7 the California Constitution.

8 Subject to and without waiving the foregoing objections, Defendant responds as follows:

9 Defendant will produce all responsive, non-privileged documents discovered following a
10 diligent search and reasonable inquiry.

11 **REQUEST FOR PRODUCTION NO. 61:**

12 Please produce the April 28, 2021, email from plaintiff to Judge Demeo, referenced by
13 defendants in their Initial Disclosures.

14 **RESPONSE TO REQUEST FOR PRODUCTION NO. 61:**

15 Defendant will produce all responsive, non-privileged documents discovered following a
16 diligent search and reasonable inquiry.

17 **REQUEST FOR PRODUCTION NO. 62:**

18 Please produce the October 2021 exchange of emails between Judge Demeo and plaintiff
19 with attached PowerPoint presentation related to the courthouse, referenced by defendants in their
20 Initial Disclosures.

21 **RESPONSE TO REQUEST FOR PRODUCTION NO. 62:**

22 Defendant will produce all responsive, non-privileged documents located following a
23 diligent search and reasonable inquiry.

24 **REQUEST FOR PRODUCTION NO. 63:**

25 Please produce the December 23, 2021, email exchange with Judge Demeo and plaintiff,
26 referenced by defendants in their Initial Disclosures.

27 ///

28 ///

1 **RESPONSE TO REQUEST FOR PRODUCTION NO. 63:**

2 Defendant will produce all responsive, non-privileged documents located following a
3 diligent search and reasonable inquiry.

4 **REQUEST FOR PRODUCTION NO. 64:**

5 Please produce the February 1, 2022, email from plaintiff to Judge Averill, referenced by
6 defendants in their Initial Disclosures.

7 **RESPONSE TO REQUEST FOR PRODUCTION NO. 64:**

8 Defendant will produce all responsive, non-privileged documents discovered following a
9 diligent search and reasonable inquiry.

10 **REQUEST FOR PRODUCTION NO. 65:**

11 Please produce the emails between Judge Demeo and plaintiff regarding a draft press
12 release, a meeting with plaintiff and justice partners, a TedTalk show on racial bias, and
13 challenges plaintiff faced reopening one of the courthouses, referenced by defendants in their
14 Initial Disclosures.

15 **RESPONSE TO REQUEST FOR PRODUCTION NO. 65:**

16 Defendant will produce all responsive, non-privileged documents located following a
17 diligent search and reasonable inquiry.

18
19 Dated: July 19, 2023

QUARLES & BRADY LLP

20
21 By: 

CORRIE J. KLEKOWSKI

Attorneys for Defendants SUPERIOR COURT OF
THE STATE OF CALIFORNIA, COUNTY OF
SONOMA and SHELLY AVERILL

PROOF OF SERVICE

Arlene D. Junior v. Superior Court of the State of California, County of Sonoma, et al.
Case No. 3:22-cv-07270-WHO

STATE OF CALIFORNIA, COUNTY OF SAN DIEGO

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of San Diego, State of California. My business address is 101 West Broadway, Ninth Floor, San Diego, CA 92101-8285.

On July 19, 2023, I served true copies of the following document(s) described as **DEFENDANT SUPERIOR COURT OF THE STATE OF CALIFORNIA, COUNTY OF SONOMA'S RESPONSES TO PLAINTIFF'S REQUEST FOR PRODUCTION OF DOCUMENTS (SET ONE)** on the interested parties in this action as follows:

Daniel M. Siegel
Sara Beladi
SIEGEL, YEE, BRUNNER & MEHTA
475 14th Street, Suite 500
Oakland, CA 94612
Telephone: (510) 839-1200
Facsimile: (510) 444-6698
E-Mail: dansiegel@siegelyee.com;
sbeladi@protonmail.com

Attorneys for Plaintiff
ARLENE D. JUNIOR

BY E-MAIL OR ELECTRONIC TRANSMISSION: I caused a copy of the document(s) to be sent from e-mail address mark.rachel@quarles.com to the persons at the e-mail addresses listed in the Service List. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on July 19, 2023, at San Diego, California.



Mark C. Rachel

EXHIBIT B

1 CORRIE J. KLEKOWSKI (SBN 251338)

corrie.klekowski@quarles.com

2 **QUARLES & BRADY LLP**

101 West Broadway, Ninth Floor

3 San Diego, California 92101-8285

Telephone: 619-237-5200

4 Facsimile: 619-615-0700

5 Attorneys for Defendants SUPERIOR COURT
OF THE STATE OF CALIFORNIA, COUNTY
6 OF SONOMA and SHELLY AVERILL

7
8 **UNITED STATES DISTRICT COURT**

9 **NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**

10
11 ARLENE D. JUNIOR,

12 Plaintiff,

13 v.

14 SUPERIOR COURT OF THE STATE OF
CALIFORNIA, COUNTY OF SONOMA,
15 and SHELLY AVERILL,

16 Defendants.

Case No. 22-cv-07270-WHO

**DEFENDANT SUPERIOR COURT OF
THE STATE OF CALIFORNIA, COUNTY
OF SONOMA'S SUPPLEMENTAL
RESPONSES TO PLAINTIFF'S
REQUEST FOR PRODUCTION OF
DOCUMENTS (SET TWO)**

Judge: Hon. William H. Orrick
Trial Date: Not Set

17
18 PROPOUNDING PARTY: Plaintiff ARLENE JUNIOR

19 RESPONDING PARTY: Defendant SUPERIOR COURT OF THE STATE OF
20 CALIFORNIA, COUNTY OF SONOMA

21 SET NUMBER: Two

22 Pursuant to Federal Rule of Civil Procedure 34 Defendant SUPERIOR COURT OF THE
23 STATE OF CALIFORNIA, COUNTY OF SONOMA provides the following written responses to
24 Plaintiff ARLENE JUNIOR's request for production of documents:

25 ///

26 ///

27 ///

28 ///

Case No. 22-cv-07270-WHO

DEFENDANT SUPERIOR COURT OF THE STATE OF CALIFORNIA, COUNTY OF SONOMA'S
SUPPLEMENTAL RESPONSES TO PLAINTIFF'S RFP OF DOCUMENTS (SET TWO)

PRELIMINARY STATEMENT

1
2 1. Nothing herein should be construed as an admission regarding the admissibility,
3 truth, accuracy or relevancy of any document.

4 2. Defendant and its attorneys have not completed their discovery or preparation for
5 trial, nor have they concluded their analysis of information gathered to date. These responses
6 therefore are based upon information presently available to and known by Defendant.

7 3. It is possible that future discovery and independent investigation may supply
8 additional facts or information, add meaning to known facts and may establish new factual
9 conclusions and contentions, all of which may lead to additions, changes in, or variations from the
10 responses set forth herein.

11 4. These responses are made without prejudice to the right of Defendant to provide
12 supplemental, additional or different responses or evidence at the time of trial.

13 5. These responses include only those documents currently within Defendant's
14 possession, custody or control.

15 6. Defendant objects to all of Plaintiff's request for production of documents to the
16 extent they call for attorney-client communications and/or attorney work product. The inclusion
17 of this objection in a specific response does not waive it in those responses in which it is not
18 specifically included because this objection is incorporated into each and every response to
19 Plaintiff's request for production of documents.

20 Subject to the foregoing general comments and objections, which are incorporated into
21 each response to Plaintiff's request for production of documents, Defendant provides the
22 following responses:

23 **RESPONSES TO REQUEST FOR PRODUCTION OF DOCUMENTS**

24 **REQUEST FOR PRODUCTION NO. 66:**

25 Please produce all email communications between plaintiff and Judge Bradford DeMeo,
26 from January 1, 2021 through December 31, 2021.

27 ///

28 ///

RESPONSE TO REQUEST FOR PRODUCTION NO. 66:

Objection. This request seeks information that is not relevant to the claims or defenses in this matter. This request is also overbroad and unduly burdensome as to scope, as it seeks all communications between Plaintiff and Judge Bradford DeMeo, the majority of which are irrelevant to the instant lawsuit. This request seeks information that is protected by the constitutional, statutory, or common law rights to privacy of third parties, including but not limited to Article I, Section I of the California Constitution. This request is duplicative of other requests propounded.

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 66:

Objection. This request seeks information that is not relevant to the claims or defenses in this matter. This request is also overbroad and unduly burdensome as to scope, as it seeks all communications between Plaintiff and Judge Bradford DeMeo, the majority of which are irrelevant to the instant lawsuit. This request seeks information that is protected by the constitutional, statutory, or common law rights to privacy of third parties, including but not limited to Article I, Section I of the California Constitution. This request is duplicative of other requests propounded.

Subject to and without waiving the foregoing objections, Defendant responds as follows:

Defendant will produce email communications between Plaintiff and Judge Bradford DeMeo from January 1, 2021 through December 31, 2021, which discuss Plaintiff's job performance, any complaints against Plaintiff, and the independent investigations related to Plaintiff.

REQUEST FOR PRODUCTION NO. 67:

Please produce all documentation from Jennifer Campbell's Sonoma County Superior Court personnel file regarding her demotion by plaintiff, from Court Supervisor to Courtroom Clerk, including, but not limited to, the status form reflecting the change in status and the memorandum written by plaintiff.

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RESPONSE TO REQUEST FOR PRODUCTION NO. 67:

Objection. This request seeks information that is not relevant to the claims or defenses in this matter and not proportional to the needs of the case. This request seeks information that is protected by the constitutional, statutory, or common law rights to privacy of third parties, including but not limited to Article I, Section I of the California Constitution. This request is vague and ambiguous as to the phrase “the memorandum written by plaintiff.”

REQUEST FOR PRODUCTION NO. 68:

Please produce all email communications between plaintiff and Jennifer Campbell regarding her demotion from Court Supervisor to Courtroom Clerk.

RESPONSE TO REQUEST FOR PRODUCTION NO. 68:

Objection. This request seeks information that is not relevant to the claims or defenses in this matter and not proportional to the needs of the case. This request seeks information that is protected by the constitutional, statutory, or common law rights to privacy of third parties, including but not limited to Article I, Section I of the California Constitution. This request is vague and ambiguous as to the phrase “regarding her demotion.”

REQUEST FOR PRODUCTION NO. 69:

Please produce all email communications between plaintiff and Jennifer Campbell regarding her promotion, by plaintiff, from Courtroom Clerk to Court Supervisor.

RESPONSE TO REQUEST FOR PRODUCTION NO. 69:

Objection. This request seeks information that is not relevant to the claims or defenses in this matter and is not proportional to the needs of the case. This request seeks information that is protected by the constitutional, statutory, or common law rights to privacy of third parties, including but not limited to Article I, Section I of the California Constitution. This request is vague and ambiguous as to the phrase “regarding her promotion.”

REQUEST FOR PRODUCTION NO. 70:

Please produce all of defendant Shelly Averill’s notes from conversations and/or meetings that she had, while serving as the Family Law Supervising Judge, regarding complaints about Jennifer Campbell’s treatment of the Court Clerks in the Family Law Clerk’s Office.

RESPONSE TO REQUEST FOR PRODUCTION NO. 70:

Objection. This request seeks information that is not relevant to the claims or defenses in this matter. This request seeks information that is protected by the constitutional, statutory, or common law rights to privacy of third parties, including but not limited to Article I, Section I of the California Constitution. This request seeks information that may be protected by the attorney-client privilege and/or attorney work product doctrine.

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 70:

Objection. This request seeks information that is not relevant to the claims or defenses in this matter. This request seeks information that is protected by the constitutional, statutory, or common law rights to privacy of third parties, including but not limited to Article I, Section I of the California Constitution. This request seeks information that may be protected by the attorney-client privilege and/or attorney work product doctrine.

Subject to and without waiving the foregoing objections, Defendant responds as follows:

Defendant will produce all responsive, non-privileged documents located following a diligent search and reasonable inquiry.

REQUEST FOR PRODUCTION NO. 71:

Please produce all of Linda Walker's notes regarding requests from plaintiff regarding Brett O'Rourke's job description, duties and responsibilities.

RESPONSE TO REQUEST FOR PRODUCTION NO. 71:

Objection. This request seeks information that is not relevant to the claims or defenses in this matter nor proportional to the needs of the case. This request is overbroad in that it is not limited in time. This request is vague and ambiguous as to "notes," "requests," and "regarding Brett O'Rourke's job description, duties and responsibilities."

REQUEST FOR PRODUCTION NO. 72:

Please produce all email communications between plaintiff and Linda Walker regarding Brett O'Rourke's job description, job duties and responsibilities, job performance and/or any complaints regarding his job performance.

///

RESPONSE TO REQUEST FOR PRODUCTION NO. 72:

Objection. This request seeks information that is not relevant to the claims or defenses in this matter. This request is overbroad in that it is not limited in time. This request is vague and ambiguous as to “notes” and “regarding Brett O’Rourke’s job description, duties and responsibilities, job performance and/or any complaints regarding his job performance.” This request seeks information that is protected by the constitutional, statutory, or common law rights to privacy of third parties, including but not limited to Article I, Section I of the California Constitution.

REQUEST FOR PRODUCTION NO. 73:

Please produce all email communications between plaintiff and Brett O’Rourke regarding the use of surveillance cameras in the Family Law clerk’s office and courtrooms.

RESPONSE TO REQUEST FOR PRODUCTION NO. 73:

Objection. This request seeks information that is not relevant to the claims or defenses in this matter nor proportional to the needs of the case. This request is overbroad in that it is not limited in time. This request is vague and ambiguous as to the phrase “the use of surveillance cameras.”

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 73:

Objection. This request seeks information that is not relevant to the claims or defenses in this matter nor proportional to the needs of the case. This request is overbroad in that it is not limited in time. This request is vague and ambiguous as to the phrase “the use of surveillance cameras.”

Subject to and without waiving the foregoing objections, Defendant responds as follows:

Defendant will produce email communications between Plaintiff and Brett O’Rourke from January 1, 2021 through May 13, 2022 in which the surveillance cameras in the Family Law clerk’s office and courtrooms is discussed.

REQUEST FOR PRODUCTION NO. 74:

Please produce all email communications between plaintiff and Brett O’Rourke regarding the rodent and rat infestation at the Empire College Annex, Civil Departments 16 and 17.

1 **RESPONSE TO REQUEST FOR PRODUCTION NO. 74:**

2 Objection. This request seeks information that is not relevant to the claims or defenses in
3 this matter nor proportional to the needs of the case. This request is intended to harass. The
4 request is vague as to time.

5 **REQUEST FOR PRODUCTION NO. 75:**

6 Please produce all email communications between plaintiff and Judge Pat Broderick
7 regarding the rodent and rat infestation at the Empire College Annex, Civil Departments 16 and
8 17.

9 **RESPONSE TO REQUEST FOR PRODUCTION NO. 75:**

10 Objection. This request seeks information that is not relevant to the claims or defenses in
11 this matter nor proportional to the needs of the case. This request is intended to harass. The
12 request is vague as to time.

13 **REQUEST FOR PRODUCTION NO. 76:**

14 Please produce all email communications between plaintiff and all court staff, including
15 judges and commissioners, regarding the rodent and rat infestation at the Empire College Annex,
16 Civil Departments 16 and 17.

17 **RESPONSE TO REQUEST FOR PRODUCTION NO. 76:**

18 Objection. This request seeks information that is not relevant to the claims or defenses in
19 this matter nor proportional to the needs of the case. This request is intended to harass. The
20 request is vague as to time.

21 **REQUEST FOR PRODUCTION NO. 77:**

22 Please produce all email communications between plaintiff and Leti Valencia from January
23 1, 2021 through December 31, 2021.

24 **RESPONSE TO REQUEST FOR PRODUCTION NO. 77:**

25 Objection. This request seeks information that is not relevant to the claims or defenses in
26 this matter nor proportional to the needs of the case. This request is also overbroad and unduly
27 burdensome as to scope and time. This request seeks information that is protected by the
28 constitutional, statutory, or common law rights to privacy of third parties, including but not limited

1 to Article I, Section I of the California Constitution. This request may also seek information
 2 protected by the attorney-client privilege and/or attorney work product doctrine.

3 **SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 77:**

4 Objection. This request seeks information that is not relevant to the claims or defenses in
 5 this matter nor proportional to the needs of the case. This request is also overbroad and unduly
 6 burdensome as to scope and time. This request seeks information that is protected by the
 7 constitutional, statutory, or common law rights to privacy of third parties, including but not limited
 8 to Article I, Section I of the California Constitution. This request may also seek information
 9 protected by the attorney-client privilege and/or attorney work product doctrine.

10 Subject to and without waiving the foregoing objections, Defendant responds as follows:

11 Defendant will produce email communications located following a diligent search and
 12 reasonable inquiry which are between Plaintiff and Leti Valencia from January 1, 2021 through
 13 December 31, 2021, and which discuss Plaintiff's job performance, complaints against Plaintiff,
 14 and/or the independent investigations related to Plaintiff.

15 **REQUEST FOR PRODUCTION NO. 78:**

16 Please produce all email communications between plaintiff and Leti Valencia and/or Hema
 17 Krishnamurthy related to the handling of the complaint that the District Attorney filed against
 18 PG&E on or around April 7, 2021.

19 **RESPONSE TO REQUEST FOR PRODUCTION NO. 78:**

20 Objection. This request seeks information that is not relevant to the claims or defenses in
 21 this matter nor proportional to the needs of the case. This request is intended to harass. This
 22 request is vague and ambiguous as to the phrases "complaint" and "the handling of the complaint."
 23 This request is vague and ambiguous in that it is unclear whether it seeks communications
 24 between Leti Valencia and Hema Krishnamurthy. This request seeks that could be protected by
 25 the attorney-client privilege and/or attorney work product doctrine.

26 **REQUEST FOR PRODUCTION NO. 79:**

27 Please produce all email communications between plaintiff and Margaret Smith regarding
 28 the handling of the complaint that the District Attorney filed against PG&E on or around April 7,

1 2021.

2 **RESPONSE TO REQUEST FOR PRODUCTION NO. 79:**

3 Objection. This request seeks information that is not relevant to the claims or defenses in
4 this matter nor proportional to the needs of the case. This request is intended to harass. This
5 request is vague and ambiguous as to the phrases “complaint” and “the handling of the complaint.”
6 This request seeks information that could be protected by the attorney-client privilege and/or
7 attorney work product doctrine.

8 **REQUEST FOR PRODUCTION NO. 80:**

9 Please produce all email communications between plaintiff and Julie Wilcox, from January
10 1, 2021 through May 30, 2022.

11 **RESPONSE TO REQUEST FOR PRODUCTION NO. 80:**

12 Objection. This request seeks information that is not relevant to the claims or defenses in
13 this matter nor proportional to the needs of the case. This request is also overbroad and unduly
14 burdensome as to scope and time. This request seeks information that is protected by the
15 constitutional, statutory, or common law rights to privacy of third parties, including but not limited
16 to Article I, Section I of the California Constitution. This request seeks information that could be
17 protected by the attorney-client privilege and/or attorney work product doctrine.

18 **SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 80:**

19 Objection. This request seeks information that is not relevant to the claims or defenses in
20 this matter nor proportional to the needs of the case. This request is also overbroad and unduly
21 burdensome as to scope and time. This request seeks information that is protected by the
22 constitutional, statutory, or common law rights to privacy of third parties, including but not limited
23 to Article I, Section I of the California Constitution. This request seeks information that could be
24 protected by the attorney-client privilege and/or attorney work product doctrine.

25 Subject to and without waiving the foregoing objections, Defendant responds as follows:

26 Defendant will produce email communications located following a diligent search and
27 reasonable inquiry which are between Plaintiff and Julie Wilcox from January 1, 2021 through
28 May 13, 2022, and which discuss Plaintiff’s job performance, complaints against Plaintiff, and/or

1 the independent investigations related to Plaintiff.

2 **REQUEST FOR PRODUCTION NO. 81:**

3 Please produce all disciplinary documents in Julie Wilcox' personnel file, issued by former
4 Chief Executive Officer Jose Guillen, including but not limited to those issued for dishonesty and
5 eavesdropping.

6 **RESPONSE TO REQUEST FOR PRODUCTION NO. 81:**

7 Objection. This request seeks information that is not relevant to the claims or defenses in
8 this matter nor proportional to the needs of the case. This request seeks information that is
9 protected by the constitutional, statutory, or common law rights to privacy of third parties,
10 including but not limited to Article I, Section I of the California Constitution. This request is
11 overbroad in that it is not limited in time or scope.

12 **REQUEST FOR PRODUCTION NO. 82:**

13 Please produce all email communications between plaintiff and Hema Krishnamurthy,
14 from October 15, 2017 through March 30, 2022.

15 **RESPONSE TO REQUEST FOR PRODUCTION NO. 82:**

16 Objection. This request seeks information that is not relevant to the claims or defenses in
17 this matter nor proportional to the needs of the case. This request is overbroad and unduly
18 burdensome as to scope, as it seeks all email communications between Plaintiff and Hema
19 Krishnamurthy, the majority of which are irrelevant to the instant lawsuit. This request is also
20 overbroad as to time. This request seeks information that is protected by the constitutional,
21 statutory, or common law rights to privacy of third parties, including but not limited to Article I,
22 Section I of the California Constitution. This request seeks information that could be protected by
23 the attorney-client privilege and/or attorney work product doctrine.

24 **SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 82:**

25 Objection. This request seeks information that is not relevant to the claims or defenses in
26 this matter nor proportional to the needs of the case. This request is overbroad and unduly
27 burdensome as to scope, as it seeks all email communications between Plaintiff and Hema
28 Krishnamurthy, the majority of which are irrelevant to the instant lawsuit. This request is also

1 overbroad as to time. This request seeks information that is protected by the constitutional,
 2 statutory, or common law rights to privacy of third parties, including but not limited to Article I,
 3 Section I of the California Constitution. This request seeks information that could be protected by
 4 the attorney-client privilege and/or attorney work product doctrine.

5 Subject to and without waiving the foregoing objections, Defendant responds as follows:

6 Defendant will produce email communications located following a diligent search and
 7 reasonable inquiry which are between Plaintiff and Hema Gopal (previously Hema
 8 Krishnamurthy) from January 1, 2021 through May 13, 2022, and which discuss Plaintiff's job
 9 performance, complaints against Plaintiff, Hema Gopal's resignation, and/or the independent
 10 investigations related to Plaintiff.

11 **REQUEST FOR PRODUCTION NO. 83:**

12 Please produce all Sonoma County Superior Court IT Director Job Postings from October
 13 2017 through April 2022.

14 **RESPONSE TO REQUEST FOR PRODUCTION NO. 83:**

15 Objection. This request seeks information that is not relevant to the claims or defenses in
 16 this matter nor proportional to the needs of the case. This request is overbroad as to time.

17 **SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 83:**

18 Objection. This request seeks information that is not relevant to the claims or defenses in
 19 this matter nor proportional to the needs of the case. This request is overbroad as to time.

20 Subject to and without waiving the foregoing objections, Defendant responds as follows:

21 Defendant will produce all responsive, non-privileged documents located following a
 22 diligent search and reasonable inquiry.

23 **REQUEST FOR PRODUCTION NO. 84:**

24 Please produce all of Kwesi Williams' notes and/or email communications regarding any
 25 of his investigation interviews in 2021 and 2022.

26 **RESPONSE TO REQUEST FOR PRODUCTION NO. 84:**

27 Objection. This request is vague and ambiguous as to "his investigation interviews." This
 28 request seeks information protected by the attorney-client privilege and/or attorney work product

1 doctrine.

2 **SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 84:**

3 Objection. This request is vague and ambiguous as to “his investigation interviews.” This
4 request seeks information protected by the attorney-client privilege and/or attorney work product
5 doctrine.

6 Subject to and without waiving the foregoing objections, Defendant responds as follows:

7 Defendant will produce any responsive, non-privileged documents located following a
8 diligent search and reasonable inquiry which reflect Kwesi Williams’ notes or communications
9 discussing the interviews he participated in as part of the independent investigations related to
10 Plaintiff.

11 **REQUEST FOR PRODUCTION NO. 85:**

12 Please produce all of Kwesi Williams’ notes, email communications, and/or meeting
13 agendas regarding the meeting, in or around November 2021, with plaintiff, Judge Averill, Judge
14 DeMeo, Mr. Williams, Hema Krishnamurthy, and Susanna Groshong, where the Directors
15 discussed Margaret Smith, and Mr. Williams reported issues regarding race to Judge DeMeo and
16 Judge Averill.

17 **RESPONSE TO REQUEST FOR PRODUCTION NO. 85:**

18 Objection. This request is vague and ambiguous as to “the meeting, in or around
19 November 2021.” This request seeks information that may be protected by the attorney-client
20 privilege and/or attorney work product doctrine.

21 **SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 85:**

22 Objection. This request is vague and ambiguous as to “the meeting, in or around
23 November 2021.” This request seeks information that may be protected by the attorney-client
24 privilege and/or attorney work product doctrine.

25 Subject to and without waiving the foregoing objections, Defendant responds as follows:

26 Defendant will produce any responsive, non-privileged documents located following a
27 diligent search and reasonable inquiry which reflect Kwesi Williams’ notes of or communications
28 discussing the November 19, 2021 meeting between Plaintiff, Judge Shelly Averill, Judge

1 Bradford DeMeo, Susannah Groshong, Hema Gopal, and Kwesi Williams.

2 **REQUEST FOR PRODUCTION NO. 86:**

3 Please produce all notes from any of the attendees of the November 2021 meeting
4 referenced in Document Request No. 85.

5 **RESPONSE TO REQUEST FOR PRODUCTION NO. 86:**

6 Objection. This request is vague and ambiguous as to the phrase “the November 2021
7 meeting referenced in Document Request No. 85.”

8 **SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 86:**

9 Objection. This request is vague and ambiguous as to the phrase “the November 2021
10 meeting referenced in Document Request No. 85.”

11 Subject to and without waiving the foregoing objections, Defendant responds as follows:

12 Defendant will produce any responsive documents located following a diligent search and
13 reasonable inquiry which reflect notes created by Kwesi Williams, Judge Shelly Averill, Judge
14 Bradford DeMeo, Hema Gopal, or Susannah Groshong of the November 19, 2021 meeting they
15 attended.

16 **REQUEST FOR PRODUCTION NO. 87:**

17 Please produce the Executive Committee and Judicial Officer Meeting Minutes and
18 agendas for all Executive Committee meetings from January 1, 2020 through April 30, 2022.

19 **RESPONSE TO REQUEST FOR PRODUCTION NO. 87:**

20 Objection. This request seeks information that is not relevant to the claims or defenses in
21 this matter nor proportional to the needs of the case. This request is overbroad as to scope, as it
22 seeks minutes and agendas for all Executive Committee meetings. This request seeks information
23 that may be protected by the attorney-client privilege and/or attorney work product doctrine.

24 **SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 87:**

25 Objection. This request seeks information that is not relevant to the claims or defenses in
26 this matter nor proportional to the needs of the case. This request is overbroad as to scope, as it
27 seeks minutes and agendas for all Executive Committee meetings. This request seeks information
28 that may be protected by the attorney-client privilege and/or attorney work product doctrine.

1 Subject to and without waiving the foregoing objections, Defendant responds as follows:

2 Defendant will produce the Executive Committee and Judicial Officer Meeting Minutes
3 and agendas for all Executive Committee meetings from January 1, 2020 through April 30, 2022
4 which reflect discussion of Plaintiff's performance, complaints against Plaintiff, or the
5 independent investigations related to Plaintiff.

6 **REQUEST FOR PRODUCTION NO. 88:**

7 Please produce all email communications between plaintiff and Doug Freidfeld, from
8 April 1, 2021 through April 30, 2022.

9 **RESPONSE TO REQUEST FOR PRODUCTION NO. 88:**

10 Objection. This request is vague and ambiguous as to the name "Doug Freidfeld." This
11 request seeks information protected by the attorney-client privilege and/or attorney work product
12 doctrine. This request is overbroad as to scope, as it seeks all communications between Plaintiff
13 and Doug Freifeld, the majority of which are irrelevant to the instant lawsuit.

14 Dated: January 29, 2024

QUARLES & BRADY LLP

15
16 By:



CORRIE J. KLEKOWSKI

Attorneys for Defendants SUPERIOR COURT OF
THE STATE OF CALIFORNIA, COUNTY OF
SONOMA and SHELLY AVERILL

PROOF OF SERVICE

Arlene D. Junior v. Superior Court of the State of California, County of Sonoma, et al.
Case No. 3:22-cv-07270-WHO

STATE OF CALIFORNIA, COUNTY OF SAN DIEGO

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of San Diego, State of California. My business address is 101 West Broadway, Ninth Floor, San Diego, CA 92101-8285.

On January 29, 2024, I served true copies of the following document(s) described as **DEFENDANT SUPERIOR COURT OF THE STATE OF CALIFORNIA, COUNTY OF SONOMA'S SUPPLEMENTAL RESPONSES TO PLAINTIFF'S REQUEST FOR PRODUCTION OF DOCUMENTS (SET TWO)** on the interested parties in this action as follows:

Daniel M. Siegel
Sara Beladi
SIEGEL, YEE, BRUNNER & MEHTA
475 14th Street, Suite 500
Oakland, CA 94612
Telephone: (510) 839-1200
Facsimile: (510) 444-6698
E-Mail: dansiegel@siegelyee.com;
sbeladi@protonmail.com
lizjohnson.siegelyee@gmail.com

Attorneys for Plaintiff
ARLENE D. JUNIOR

BY E-MAIL OR ELECTRONIC TRANSMISSION: I caused a copy of the document(s) to be sent from e-mail address mark.rachel@quarles.com to the persons at the e-mail addresses listed in the Service List. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on January 29, 2024, at San Diego, California.



Mark C. Rachel

EXHIBIT C

1 CORRIE J. KLEKOWSKI (SBN 251338)

corrie.klekowski@quarles.com

2 **QUARLES & BRADY LLP**

101 West Broadway, Ninth Floor

3 San Diego, California 92101-8285

Telephone: 619-237-5200

4 Facsimile: 619-615-0700

5 Attorneys for Defendants SUPERIOR COURT
OF THE STATE OF CALIFORNIA, COUNTY
6 OF SONOMA and SHELLY AVERILL

7
8 **UNITED STATES DISTRICT COURT**

9 **NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**

10
11 ARLENE D. JUNIOR,

12 Plaintiff,

13 v.

14 SUPERIOR COURT OF THE STATE OF
CALIFORNIA, COUNTY OF SONOMA,
15 and SHELLY AVERILL,

16 Defendants.

Case No. 22-cv-07270-WHO

**DEFENDANT SUPERIOR COURT OF
THE STATE OF CALIFORNIA, COUNTY
OF SONOMA'S RESPONSES TO
PLAINTIFF'S REQUEST FOR
PRODUCTION OF DOCUMENTS (SET
TWO)**

Judge: Hon. William H. Orrick
Trial Date: Not Set

17
18 PROPOUNDING PARTY: Plaintiff ARLENE JUNIOR

19 RESPONDING PARTY: Defendant SUPERIOR COURT OF THE STATE OF
20 CALIFORNIA, COUNTY OF SONOMA

21 SET NUMBER: Two

22 Pursuant to Federal Rule of Civil Procedure 34 Defendant SUPERIOR COURT OF THE
23 STATE OF CALIFORNIA, COUNTY OF SONOMA provides the following written responses to
24 Plaintiff ARLENE JUNIOR's request for production of documents:

25 ///

26 ///

27 ///

28 ///

PRELIMINARY STATEMENT

1
2 1. Nothing herein should be construed as an admission regarding the admissibility,
3 truth, accuracy or relevancy of any document.

4 2. Defendant and its attorneys have not completed their discovery or preparation for
5 trial, nor have they concluded their analysis of information gathered to date. These responses
6 therefore are based upon information presently available to and known by Defendant.

7 3. It is possible that future discovery and independent investigation may supply
8 additional facts or information, add meaning to known facts and may establish new factual
9 conclusions and contentions, all of which may lead to additions, changes in, or variations from the
10 responses set forth herein.

11 4. These responses are made without prejudice to the right of Defendant to provide
12 supplemental, additional or different responses or evidence at the time of trial.

13 5. These responses include only those documents currently within Defendant's
14 possession, custody or control.

15 6. Defendant objects to all of Plaintiff's request for production of documents to the
16 extent they call for attorney-client communications and/or attorney work product. The inclusion
17 of this objection in a specific response does not waive it in those responses in which it is not
18 specifically included because this objection is incorporated into each and every response to
19 Plaintiff's request for production of documents.

20 Subject to the foregoing general comments and objections, which are incorporated into
21 each response to Plaintiff's request for production of documents, Defendant provides the
22 following responses:

23 **RESPONSES TO REQUEST FOR PRODUCTION OF DOCUMENTS**

24 **REQUEST FOR PRODUCTION NO. 66:**

25 Please produce all email communications between plaintiff and Judge Bradford DeMeo,
26 from January 1, 2021 through December 31, 2021.

27 ///

28 ///

RESPONSE TO REQUEST FOR PRODUCTION NO. 66:

Objection. This request seeks information that is not relevant to the claims or defenses in this matter. This request is also overbroad and unduly burdensome as to scope, as it seeks all communications between Plaintiff and Judge Bradford DeMeo, the majority of which are irrelevant to the instant lawsuit. This request seeks information that is protected by the constitutional, statutory, or common law rights to privacy of third parties, including but not limited to Article I, Section I of the California Constitution. This request is duplicative of other requests propounded.

REQUEST FOR PRODUCTION NO. 67:

Please produce all documentation from Jennifer Campbell's Sonoma County Superior Court personnel file regarding her demotion by plaintiff, from Court Supervisor to Courtroom Clerk, including, but not limited to, the status form reflecting the change in status and the memorandum written by plaintiff.

RESPONSE TO REQUEST FOR PRODUCTION NO. 67:

Objection. This request seeks information that is not relevant to the claims or defenses in this matter and not proportional to the needs of the case. This request seeks information that is protected by the constitutional, statutory, or common law rights to privacy of third parties, including but not limited to Article I, Section I of the California Constitution. This request is vague and ambiguous as to the phrase "the memorandum written by plaintiff."

REQUEST FOR PRODUCTION NO. 68:

Please produce all email communications between plaintiff and Jennifer Campbell regarding her demotion from Court Supervisor to Courtroom Clerk.

RESPONSE TO REQUEST FOR PRODUCTION NO. 68:

Objection. This request seeks information that is not relevant to the claims or defenses in this matter and not proportional to the needs of the case. This request seeks information that is protected by the constitutional, statutory, or common law rights to privacy of third parties, including but not limited to Article I, Section I of the California Constitution. This request is vague and ambiguous as to the phrase "regarding her demotion."

REQUEST FOR PRODUCTION NO. 69:

Please produce all email communications between plaintiff and Jennifer Campbell regarding her promotion, by plaintiff, from Courtroom Clerk to Court Supervisor.

RESPONSE TO REQUEST FOR PRODUCTION NO. 69:

Objection. This request seeks information that is not relevant to the claims or defenses in this matter and is not proportional to the needs of the case. This request seeks information that is protected by the constitutional, statutory, or common law rights to privacy of third parties, including but not limited to Article I, Section I of the California Constitution. This request is vague and ambiguous as to the phrase “regarding her promotion.”

REQUEST FOR PRODUCTION NO. 70:

Please produce all of defendant Shelly Averill’s notes from conversations and/or meetings that she had, while serving as the Family Law Supervising Judge, regarding complaints about Jennifer Campbell’s treatment of the Court Clerks in the Family Law Clerk’s Office.

RESPONSE TO REQUEST FOR PRODUCTION NO. 70:

Objection. This request seeks information that is not relevant to the claims or defenses in this matter. This request seeks information that is protected by the constitutional, statutory, or common law rights to privacy of third parties, including but not limited to Article I, Section I of the California Constitution. This request seeks information that may be protected by the attorney-client privilege and/or attorney work product doctrine.

REQUEST FOR PRODUCTION NO. 71:

Please produce all of Linda Walker’s notes regarding requests from plaintiff regarding Brett O’Rourke’s job description, duties and responsibilities.

RESPONSE TO REQUEST FOR PRODUCTION NO. 71:

Objection. This request seeks information that is not relevant to the claims or defenses in this matter nor proportional to the needs of the case. This request is overbroad in that it is not limited in time. This request is vague and ambiguous as to “notes,” “requests,” and “regarding Brett O’Rourke’s job description, duties and responsibilities.”

REQUEST FOR PRODUCTION NO. 72:

Please produce all email communications between plaintiff and Linda Walker regarding Brett O'Rourke's job description, job duties and responsibilities, job performance and/or any complaints regarding his job performance.

RESPONSE TO REQUEST FOR PRODUCTION NO. 72:

Objection. This request seeks information that is not relevant to the claims or defenses in this matter. This request is overbroad in that it is not limited in time. This request is vague and ambiguous as to "notes" and "regarding Brett O'Rourke's job description, duties and responsibilities, job performance and/or any complaints regarding his job performance." This request seeks information that is protected by the constitutional, statutory, or common law rights to privacy of third parties, including but not limited to Article I, Section I of the California Constitution.

REQUEST FOR PRODUCTION NO. 73:

Please produce all email communications between plaintiff and Brett O'Rourke regarding the use of surveillance cameras in the Family Law clerk's office and courtrooms.

RESPONSE TO REQUEST FOR PRODUCTION NO. 73:

Objection. This request seeks information that is not relevant to the claims or defenses in this matter nor proportional to the needs of the case. This request is overbroad in that it is not limited in time. This request is vague and ambiguous as to the phrase "the use of surveillance cameras."

REQUEST FOR PRODUCTION NO. 74:

Please produce all email communications between plaintiff and Brett O'Rourke regarding the rodent and rat infestation at the Empire College Annex, Civil Departments 16 and 17.

RESPONSE TO REQUEST FOR PRODUCTION NO. 74:

Objection. This request seeks information that is not relevant to the claims or defenses in this matter nor proportional to the needs of the case. This request is intended to harass. The request is vague as to time.

1 **REQUEST FOR PRODUCTION NO. 75:**

2 Please produce all email communications between plaintiff and Judge Pat Broderick
3 regarding the rodent and rat infestation at the Empire College Annex, Civil Departments 16 and
4 17.

5 **RESPONSE TO REQUEST FOR PRODUCTION NO. 75:**

• 6 Objection. This request seeks information that is not relevant to the claims or defenses in
7 this matter nor proportional to the needs of the case. This request is intended to harass. The
8 request is vague as to time.

9 **REQUEST FOR PRODUCTION NO. 76:**

10 Please produce all email communications between plaintiff and all court staff, including
11 judges and commissioners, regarding the rodent and rat infestation at the Empire College Annex,
12 Civil Departments 16 and 17.

13 **RESPONSE TO REQUEST FOR PRODUCTION NO. 76:**

14 Objection. This request seeks information that is not relevant to the claims or defenses in
15 this matter nor proportional to the needs of the case. This request is intended to harass. The
16 request is vague as to time.

17 **REQUEST FOR PRODUCTION NO. 77:**

18 Please produce all email communications between plaintiff and Leti Valencia from January
19 1, 2021 through December 31, 2021.

20 **RESPONSE TO REQUEST FOR PRODUCTION NO. 77:**

21 Objection. This request seeks information that is not relevant to the claims or defenses in
22 this matter nor proportional to the needs of the case. This request is also overbroad and unduly
23 burdensome as to scope and time. This request seeks information that is protected by the
24 constitutional, statutory, or common law rights to privacy of third parties, including but not limited
25 to Article I, Section I of the California Constitution. This request may also seek information
26 protected by the attorney-client privilege and/or attorney work product doctrine.

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REQUEST FOR PRODUCTION NO. 78:

Please produce all email communications between plaintiff and Leti Valencia and/or Hema Krishnamurthy related to the handling of the complaint that the District Attorney filed against PG&E on or around April 7, 2021.

RESPONSE TO REQUEST FOR PRODUCTION NO. 78:

Objection. This request seeks information that is not relevant to the claims or defenses in this matter nor proportional to the needs of the case. This request is intended to harass. This request is vague and ambiguous as to the phrases “complaint” and “the handling of the complaint.” This request is vague and ambiguous in that it is unclear whether it seeks communications between Leti Valencia and Hema Krishnamurthy. This request seeks that could be protected by the attorney-client privilege and/or attorney work product doctrine.

REQUEST FOR PRODUCTION NO. 79:

Please produce all email communications between plaintiff and Margaret Smith regarding the handling of the complaint that the District Attorney filed against PG&E on or around April 7, 2021.

RESPONSE TO REQUEST FOR PRODUCTION NO. 79:

Objection. This request seeks information that is not relevant to the claims or defenses in this matter nor proportional to the needs of the case. This request is intended to harass. This request is vague and ambiguous as to the phrases “complaint” and “the handling of the complaint.” This request seeks information that could be protected by the attorney-client privilege and/or attorney work product doctrine.

REQUEST FOR PRODUCTION NO. 80:

Please produce all email communications between plaintiff and Julie Wilcox, from January 1, 2021 through May 30, 2022.

RESPONSE TO REQUEST FOR PRODUCTION NO. 80:

Objection. This request seeks information that is not relevant to the claims or defenses in this matter nor proportional to the needs of the case. This request is also overbroad and unduly burdensome as to scope and time. This request seeks information that is protected by the

1 constitutional, statutory, or common law rights to privacy of third parties, including but not limited
 2 to Article I, Section I of the California Constitution. This request seeks information that could be
 3 protected by the attorney-client privilege and/or attorney work product doctrine.

4 **REQUEST FOR PRODUCTION NO. 81:**

5 Please produce all disciplinary documents in Julie Wilcox' personnel file, issued by former
 6 Chief Executive Officer Jose Guillen, including but not limited to those issued for dishonesty and
 7 eavesdropping.

8 **RESPONSE TO REQUEST FOR PRODUCTION NO. 81:**

9 Objection. This request seeks information that is not relevant to the claims or defenses in
 10 this matter nor proportional to the needs of the case. This request seeks information that is
 11 protected by the constitutional, statutory, or common law rights to privacy of third parties,
 12 including but not limited to Article I, Section I of the California Constitution. This request is
 13 overbroad in that it is not limited in time or scope.

14 **REQUEST FOR PRODUCTION NO. 82:**

15 Please produce all email communications between plaintiff and Hema Krishnamurthy,
 16 from October 15, 2017 through March 30, 2022.

17 **RESPONSE TO REQUEST FOR PRODUCTION NO. 82:**

18 Objection. This request seeks information that is not relevant to the claims or defenses in
 19 this matter nor proportional to the needs of the case. This request is overbroad and unduly
 20 burdensome as to scope, as it seeks all email communications between Plaintiff and Hema
 21 Krishnamurthy, the majority of which are irrelevant to the instant lawsuit. This request is also
 22 overbroad as to time. This request seeks information that is protected by the constitutional,
 23 statutory, or common law rights to privacy of third parties, including but not limited to Article I,
 24 Section I of the California Constitution. This request seeks information that could be protected by
 25 the attorney-client privilege and/or attorney work product doctrine.

26 **REQUEST FOR PRODUCTION NO. 83:**

27 Please produce all Sonoma County Superior Court IT Director Job Postings from October
 28 2017 through April 2022.

RESPONSE TO REQUEST FOR PRODUCTION NO. 83:

Objection. This request seeks information that is not relevant to the claims or defenses in this matter nor proportional to the needs of the case. This request is overbroad as to time.

REQUEST FOR PRODUCTION NO. 84:

Please produce all of Kwesi Williams' notes and/or email communications regarding any of his investigation interviews in 2021 and 2022.

RESPONSE TO REQUEST FOR PRODUCTION NO. 84:

Objection. This request is vague and ambiguous as to "his investigation interviews." This request seeks information protected by the attorney-client privilege and/or attorney work product doctrine.

REQUEST FOR PRODUCTION NO. 85:

Please produce all of Kwesi Williams' notes, email communications, and/or meeting agendas regarding the meeting, in or around November 2021, with plaintiff, Judge Averill, Judge DeMeo, Mr. Williams, Hema Krishnamurthy, and Susanna Groshong, where the Directors discussed Margaret Smith, and Mr. Williams reported issues regarding race to Judge DeMeo and Judge Averill.

RESPONSE TO REQUEST FOR PRODUCTION NO. 85:

Objection. This request is vague and ambiguous as to "the meeting, in or around November 2021." This request seeks information that may be protected by the attorney-client privilege and/or attorney work product doctrine.

REQUEST FOR PRODUCTION NO. 86:

Please produce all notes from any of the attendees of the November 2021 meeting referenced in Document Request No. 85.

RESPONSE TO REQUEST FOR PRODUCTION NO. 86:

Objection. This request is vague and ambiguous as to the phrase "the November 2021 meeting referenced in Document Request No. 85."

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1 **REQUEST FOR PRODUCTION NO. 87:**

2 Please produce the Executive Committee and Judicial Officer Meeting Minutes and
3 agendas for all Executive Committee meetings from January 1, 2020 through April 30, 2022.

4 **RESPONSE TO REQUEST FOR PRODUCTION NO. 87:**

5 Objection. This request seeks information that is not relevant to the claims or defenses in
6 this matter nor proportional to the needs of the case. This request is overbroad as to scope, as it
7 seeks minutes and agendas for all Executive Committee meetings. This request seeks information
8 that may be protected by the attorney-client privilege and/or attorney work product doctrine.

9 **REQUEST FOR PRODUCTION NO. 88:**

10 Please produce all email communications between plaintiff and Doug Freidfeld, from
11 April 1, 2021 through April 30, 2022.

12 **RESPONSE TO REQUEST FOR PRODUCTION NO. 88:**

13 Objection. This request is vague and ambiguous as to the name "Doug Freidfeld." This
14 request seeks information protected by the attorney-client privilege and/or attorney work product
15 doctrine. This request is overbroad as to scope, as it seeks all communications between Plaintiff
16 and Doug Freifeld, the majority of which are irrelevant to the instant lawsuit.

17
18 Dated: January 16, 2024

QUARLES & BRADY LLP

19
20 By: _____

CORRIE J. KLEKOWSKI
Attorneys for Defendants SUPERIOR COURT OF
THE STATE OF CALIFORNIA, COUNTY OF
SONOMA and SHELLY AVERILL